

# Responsible gambling codes and harm minimisation policies of Australian jurisdictions

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A Desktop Review

FINAL REPORT



*SIMPLIFYING GOVERNMENT*

Prepared for:

**Tasmanian Liquor  
and Gaming  
Commission**

November 2021

## Disclaimer

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## Glossary

<b>A control</b>	A specific requirement that is applied to a form of authorised gambling
<b>ACMA</b>	Australian Communications and Media Authority
<b>ACT</b>	Australian Capital Territory
<b>ATM</b>	Automatic teller machine
<b>CSL</b>	Community Support Levy
<b>Crown Perth Code</b>	Crown Perth Responsible Gambling Code of Practice
<b>CRM</b>	Customer Relationship Management
<b>EGM</b>	Electronic Gaming Machine
<b>EFT</b>	Electronic funds transfer
<b>EFTPOS</b>	Electronic funds transfer at point of sale
<b>FATG</b>	Fully automated table game
<b>GCO</b>	Gambling contact officer
<b>LMO</b>	Licensed monitoring operator
<b>Ministerial Direction</b>	Responsible Gambling Codes of Conduct Ministerial Direction (Victoria)
<b>National Framework</b>	National Consumer Protection Framework covering online wagering
<b>NSW</b>	New South Wales
<b>NT</b>	Northern Territory
<b>Qld</b>	Queensland
<b>Queensland Code</b>	Queensland Responsible Gambling Code of Practice
<b>RGAC</b>	Queensland Responsible Gambling Advisory Committee
<b>RTP</b>	Return to player
<b>RCG</b>	Responsible Conduct of Gambling
<b>RWWA</b>	Racing and Wagering Western Australia
<b>RWWA Code</b>	Responsible Wagering Code of Practice (RWWA)
<b>SA</b>	South Australia
<b>SEIS</b>	Social and Economic Impact Study into Gambling in Tasmania
<b>SMS</b>	Short message service
<b>TAS</b>	Tasmania
<b>Tasmanian Code</b>	Responsible Gambling Mandatory Code of Practice for Tasmania
<b>TGES</b>	Tasmanian Gambling Exclusion Scheme



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<b>TITO</b>	Ticket-in ticket-out
<b>TLGC</b>	Tasmanian Liquor and Gaming Commission
<b>VCGLR</b>	Victorian Commission of Gambling and Liquor Regulation
<b>VIC</b>	Victoria
<b>WA</b>	Western Australia



## Executive Summary

The Tasmanian Liquor and Gaming Commission is responsible for the regulation of gaming and wagering in Tasmania.<sup>1</sup> A key function of the Commission is to foster responsible gambling and ensure the harm from problem gambling is minimised.

As required by legislation, the Commission is conducting its second review of the *Responsible Gambling Mandatory Code of Practice for Tasmania* (the Tasmanian Code). The Tasmanian Code was introduced in 2012 to provide a best practice approach to gambling regulation within Tasmania. It was previously reviewed in 2017, with that review leading to a range of improvements to the Tasmanian Code.

This research paper is the first phase of the review and involved a desktop analysis of the Tasmanian Code compared to the responsible gambling and harm minimisation controls in all other Australian states and territories. It identifies where the Tasmanian Code is equal to or broader than other Australian states and territories. It also identifies potential improvements to the Tasmanian Code that can be considered and examines what improvements may be necessary to support the implementation of the Tasmanian Government's Future Gaming Market Reforms post 2023.

The desktop analysis was supported by consultations with the Tasmanian Department of Treasury and Finance's Liquor and Gaming Branch on the operation and scope of the Tasmanian Code and the nature of the Tasmanian Government's Future Gaming Market Reforms.

For convenience of analysis, the concept of a 'control' is used to indicate specific jurisdictional operational level processes and practices aimed at harm minimisation and ensuring responsible gambling.

## Findings

### Harm Minimisation and Responsible Gambling Controls

#### Key Findings

- The breadth and depth of the controls in the Tasmanian Code continue to compare favourably with the harm minimisation and responsible gambling controls in other Australian jurisdictions
  - the Tasmanian Code contains many controls that are not present in other jurisdictions or go beyond the scope of the controls in other jurisdictions
- There are some controls in other jurisdictions that Tasmania does not have or the scope of controls go beyond that in the Tasmanian Code (including the application of controls to other types of gambling)
  - these controls should be examined to determine whether they should be incorporated in the Tasmanian Code.

Since 2017, there has been a moderate level of change to harm minimisation and responsible gambling controls nationally, with New South Wales (NSW) and South Australia (SA) being the most active jurisdictions:

- Changes in NSW focused on controls relating to advertising, inducements, player loyalty programs, service of food and alcohol, staff training and information to players

<sup>1</sup> Administrative, policy and compliance support for the Commission is provided by the Department of Treasury and Finance, which is responsible to the Minister for Finance.

- Changes in SA related to all the control areas covered by the Tasmanian Code.

The Tasmanian Code continues to provide a broader range of controls than can be found in other jurisdictions, exceeding them in numerous areas. Several areas were identified where controls in other jurisdictions could be examined to determine if there is a need for them to be incorporated in the Tasmanian Code where legislation allows:

- For five of the ten areas of gambling operations in the Tasmanian Code, some comparable controls were identified in another jurisdiction that went further in scope. These areas were advertising, inducements, access to cash, player loyalty programs and payment of winnings.
- Key differences were identified in how other jurisdictions apply controls to gambling activities, with some controls that are present in the Tasmanian Code applied to a broader range of types of gambling. This happened most often for controls regulating online wagering and lotteries.
- There are some controls in other jurisdictions that have no equivalent control in the Tasmanian Code.

The Tasmanian Gambling Exclusion Scheme also continues to compare favourably to equivalent schemes in other jurisdictions, with only minimal change to those schemes since 2017.

### Future Gambling Reforms

#### Key Findings

- The Government's Future Gaming Market Reforms are predominantly structural in nature and are not likely to have a major impact on gambling market behaviour.
- Two new harm minimisation measures relating to use of technology are to be investigated by the Commission that may moderate gambling behaviour.

An analysis of the potential impact of the Government's Future Gaming Market Reforms concluded that the reforms are predominantly structural in nature and are not likely to have a major impact on gambling behaviour.

The Commission is to investigate the extent to which introduction into Tasmanian casinos, hotels and clubs of facial recognition technology and a smartcard-based identification system that enables a pre-commitment system could minimise gambling harm. The extent of the impact will be analysed by the Commission in its investigations on the introduction of these measures and a report will be provided to the Minister by 30 June 2022.

While there may be some impacts on gambling behaviour arising from the reforms, it is not clear that any changes to the Tasmanian Code are warranted simply based on this identified potential impact. This is because:

- The Tasmanian Code already contains a wide range of controls relevant to those areas of gambling behaviour that may be affected by the reforms
- Existing hotel and club venue operators, granted new venue licences under the reforms, are already conversant with the Tasmanian Code as they and their staff must comply with it from an operational perspective.

Rather, the challenge will be to ensure that in the move from a single gaming operator model for EGMs to an individual venue operator model that there is sufficient enforcement of the Tasmanian Code. In this respect, the Minister undertook at the 2021 Legislative Council Estimates Committee hearing on the Government's reforms that *'the government will resource the branch which supports*

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*the commission to adequately fulfil the commission's responsibilities which are, of course, very considerable'.<sup>2</sup>*

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<sup>2</sup> [Transcript of Legislative Council Estimates Committee A](#), 6 December 2021, p 53



# 1 Introduction

## 1.1 Purpose

The Tasmanian Liquor and Gaming Commission is conducting its second review of the *Responsible Gambling Mandatory Code of Practice for Tasmania* (the Tasmanian Code).

This research paper:

- outlines how the Tasmanian Code compares with the responsible gambling and harm minimisation measures in other Australian jurisdictions
- indicates how the regulatory environment has changed in Australian jurisdictions since the last review of the Tasmanian Code in 2017
- identifies whether there are harm minimisation and responsible gambling controls in other jurisdictions that could be considered for application in Tasmania or whether there are additional controls required to support the Tasmanian Government's Future Gaming Market Reforms that have been introduced into the Tasmanian Parliament.

## 1.2 Background

The Commission is an independent body established under the *Gaming Control Act 1993* that is responsible for the regulation of gaming and wagering in Tasmania.<sup>3</sup> A key function of the Commission is to foster responsible gambling and ensure the harm from problem gambling is minimised.

In 2008 the Government introduced a range of measures to address problem gambling. This included amending the Act to require the Commission to develop a mandatory code of practice and to review it at least every five years. Subsequently, in 2012 the Commission introduced the *Responsible Gambling Mandatory Code of Practice for Tasmania*. The Commission designed the Tasmanian Code to provide a best practice approach to gambling regulation within the Tasmanian context.

The first review of the Tasmanian Code was undertaken in 2017. As a result of that review, the Commission made several improvements to the Tasmanian Code (see Section 2.3). The Commission is now undertaking the second review of the Code, which comprises two phases:

1. a desktop review to collect and analyse gambling codes and harm minimisation policies of other Australian jurisdictions and identify potential improvements to the Tasmanian Code that will support the implementation of the Tasmanian Government's Future Gaming Market Reforms post 2023
2. a stakeholder consultation process for evidence-based submissions on the effectiveness of the current Code measures.

The findings of the review will provide a basis for the Commission to consider enhancing or implementing further measures for achieving the following desired outcomes of the Tasmanian Code:

- contributing to minimising the harm from gambling and promoting responsible gambling practices in Tasmania
- providing for gambling environments that are safer and presenting gambling products in a responsible manner

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<sup>3</sup> Administrative, policy and compliance support for the Commission is provided by the Department of Treasury and Finance, which is responsible to the Minister for Finance.



- ensuring that the public and the gambling industry understand their rights and responsibilities in relation to the matters covered by the Tasmanian Code
- assisting people to make informed decisions about their gambling practices
- ensuring that gambling staff can develop additional skills to assist them to engage with people who may be displaying problem gambling behaviours.<sup>4</sup>

### 1.3 Scope and Methodology

This research paper involved a desktop analysis of the Tasmanian Code in relation to the responsible gambling and harm minimisation controls in all other Australian states and territories. Developing the paper involved:

1. a website review of gambling control measures of relevant jurisdictional regulators
2. an analysis of how the regulatory environment for gambling has changed in Australian jurisdictions since the last review of the Tasmanian Code in 2017
3. developing a classification system and using it to compare the Tasmanian Code with controls in other jurisdictions
4. analysing the expected impacts of the Tasmanian Government’s Future Gaming Market Reforms on gambling behaviour to identify key protections that could be considered to support those reforms.

Jurisdictional regulatory regimes arguably have the effect of harm minimisation by virtue of their existence – for example, the licensing of operators and constraints on the gambling services they can offer to the public under their licence is an attempt at a broad level to minimise the harms from gambling.

However, the focus of this paper is on those operational measures that are applied within the broader regulatory frameworks that are specifically aimed at minimising the potential harms resulting from gambling and ensuring responsible gambling practices are in place.

For convenience of analysis, this paper uses the concept of a ‘control’ to indicate specific jurisdictional operational level processes and practices aimed at harm minimisation and ensuring responsible gambling.

There was ongoing consultation with the Department of Treasury and Finance’s Liquor and Gaming Branch during the preparation of this paper to ensure it provides a sound basis for phase 2 of the Commission’s review. In particular, a review of the preliminary findings of the comparative analysis by Liquor and Gaming Branch staff identified several controls in other jurisdictions that apply in Tasmania but are not in the Tasmanian Code.

Key search terms used as a basis for identifying relevant information in jurisdictional documents are contained in Table 1.

Table 1: Key search terms

1. Gambling	2. Harm minimisation	3. Policies and initiatives	4. Effectiveness
<ul style="list-style-type: none"> <li>• Gaming</li> <li>• Wagering / wager</li> <li>• Pokies / slot machine / electronic</li> </ul>	<ul style="list-style-type: none"> <li>• Regulation / regulate</li> <li>• Control</li> <li>• Standard</li> </ul>	<ul style="list-style-type: none"> <li>• Administer</li> <li>• Government / govern</li> <li>• Scheme</li> </ul>	<ul style="list-style-type: none"> <li>• Research</li> <li>• Study</li> <li>• Gambling research</li> <li>• Gambling regulation</li> </ul>

<sup>4</sup> [Responsible Gambling Mandatory Code of Practice for Tasmania](#), Tasmanian Liquor and Gaming Commission, Version 3.1, March 2020, p4



1. Gambling	2. Harm minimisation	3. Policies and initiatives	4. Effectiveness
gaming machine / EGM • Online / interactive • Keno	• Responsible gambling • Training • Inducement / credit / voucher • Player loyalty • Minor / excluded person • Advertise / advertising • Alcohol	• Strategy	

A categorisation schema (see Section 3) was used to facilitate a comparison of the harm minimisation and responsible gambling controls in the Tasmanian Code with controls in other jurisdictions for the six types of gambling covered by the Tasmanian Code. The schema is similar, but simpler to that used in the 2017 research paper.

It should be noted that for the purposes of comparative analysis:

- harm minimisation and responsible gambling controls were present in other jurisdictions in a variety of ways – hence the comparison is against where these controls lay in legislation, regulation or other subordinate instrument, including a mandatory code of practice
- where there have been no changes to controls in either the Tasmanian Code or the comparison jurisdiction since 2017, there may be some differences in the comparison detailed in this paper due to different researcher interpretations
- where jurisdictional legislation contained controls applying to a ‘casino’ it was assumed that the control applied to all gambling activities at a casino (gaming machines, table gaming, keno, terrestrial wagering) unless otherwise stated
- where jurisdictional legislation contained controls applying to ‘wagering’ it was assumed (unless otherwise specified) that the control applied to both terrestrial wagering and online wagering.

While the comparative analysis methodology provides a sound overview of the similarities and differences between the Tasmanian Code and the controls in other jurisdictions, there are some limitations:

- The desktop nature of the methodology meant that the comparison analysis relied on the interpretation of controls based on relevant documents identified through online searching. Misinterpretation was mitigated by clarification sought from and provided by Liquor and Gaming Branch staff, whose contextual understanding of gambling controls assisted in refining the findings to the key differences in gambling controls. The Branch also acted as an intermediary clarifying with other jurisdictions where required.
- There may be some controls not available online that have implications for gambling and harm minimisation that exist in the other jurisdictions. Further, it was assumed that the jurisdictional controls available online are current.



## 2 Tasmanian Gambling Controls

### 2.1 Regulatory Overview

The independent Tasmanian Liquor and Gaming Commission oversees the regulation of gambling activity in Tasmania.<sup>5</sup>

The Gaming Control Act provides the key legislative framework for responsible gambling in Tasmania. It regulates various forms of gambling and establishes the Commission and the Tasmanian Gambling Exclusion Scheme. The key Acts and Regulations are as follows:

Table 2: Tasmanian Gambling Legislative Instruments

Regulator	Primary Instruments	Subordinate Instruments
Tasmanian Liquor and Gaming Commission	<i>Gaming Control Act 1993</i>	<i>Gaming Control Regulations 2014</i> <i>Gaming Control (Infringement Notices) Regulations 2021</i>
	<i>TT-Line Gaming Act 1993</i>	<i>TT-Line Gaming Regulations 2014</i>

The Commission has made a range of separate rules and standards to ‘ensure that gambling in Tasmania is conducted in a fair and proper manner’.<sup>6</sup> These rules and standards are shown in Table 3 and contain controls on the operation of licenced gambling businesses and/or the types of gambling conducted by those businesses.

Table 3: Tasmanian Gambling Controls – Rules and Standards

Authorising Act	Rules and Standards
<i>Gaming Control Act 1993</i>	Casino Licence Commission Rules
	Foreign Games Permit Commission Rules
	Gaming Operator Licence Commission Rules
	Gambling Product Advertising Standards
	Gaming Machine Standards
	Licensed Premises Gaming Licence Commission Rules
	Minor Gaming Rules and Conditions <ul style="list-style-type: none"> <li>These are comprised of separate rules relating to various types of authorised minor gaming. Authorised games include Raffles, Bingo, Calcutta Sweepstakes, Lucky Envelopes, Dancing Dollars and Instant Draw Bingo.<sup>7</sup></li> </ul>
	Official Rules of Casino Games

<sup>5</sup> The Director of Racing regulates the operations of Tasmanian on-course bookmakers in accordance with the *Racing Regulation Act 2004*.

<sup>6</sup> [Liquor and Gaming](#) website. Accessed 6 September 2021

<sup>7</sup> [Liquor and Gaming](#) website. Accessed 6 September 2021

Authorising Act	Rules and Standards
	Official Wagering Rules
	Premium Player Program (Pre-Commitment) Commission Rules
	Premium Player Program (Pre-Commitment) Limit Setting Standards
	Responsible Gambling Mandatory Code of Practice for Tasmania
	Surveillance Standards for Clubs, Hotels and UBET Agent Outlets
	Tasmanian Gaming Licence Commission Rules
	Tasmanian Gaming Licence Technical Standard
	Technical Standards for Recorded Surveillance in Gaming Premises
	TLGC Card Based Gaming Systems Technical Standards
	TLGC Gaming Machine Monitoring System Technical Standard
	TLGC Keno System Technical Standard
	TLGC Table Gaming Management System Technical Standards
	TT-Line Company Pty Ltd Licence Commission Rules.

## 2.2 Harm Minimisation and Responsible Gambling

The Tasmanian Code specifies the controls aimed at minimising the harms arising from gambling and promoting responsible gambling across a range of areas. The Code is supported by a range of rules, standards and licensing conditions established by the Commission. Compliance with the Code and its supporting rules, standards and licensing conditions is mandatory for all relevant prescribed licence holders under the Act and non-compliance can result in disciplinary action.

There is no statutory definition of 'harm minimisation', or 'harms arising from problem gambling'. Rather, the Tasmanian Code and Rules use the national definition of 'problem gambling':

*'[problem gambling] is characterised by difficulties in limiting money and/or time spent on gambling, which leads to adverse consequences for the gambler, others, or for the community'.<sup>8</sup>*

The Tasmanian Code establishes controls covering 10 areas of gambling operations:

- advertising
- inducements
- player loyalty programs
- access to cash
- payment of winnings

<sup>8</sup> Ibid, p. 3



- lighting
- service of food and alcohol
- clocks in gambling areas
- staff training in recognising people with gambling problems
- information to players.

The Tasmanian Code specifies which of the controls applies to the six different forms of gambling allowed in Tasmania:

- gaming machines
- table gaming
- keno
- terrestrial wagering
- online wagering
- lotteries.

Appendix A outlines how the controls contained within the Tasmanian Code are relevant to the different types of gambling activities.

In addition to the Tasmanian Code, the Gaming Control Act establishes the Tasmanian Gambling Exclusion Scheme (TGES). Under the TGES, persons can be excluded from gambling in one, multiple or all licensed gambling venues in the State (or can choose to exclude from participating in gambling at venue/s) and from gambling through Tasmanian licensed online gambling operators. The operation of the TGES is supported by an online database.

The exclusion methods available under the TGES are detailed in Table 37.

A key function of the Tasmanian Liquor and Gaming Commission is '*...to foster responsible gambling and minimise the harm from problem gambling*'.<sup>9</sup>

The Tasmanian Government is required<sup>10</sup> to triennially commission an independent review of the social and economic impact of gambling in Tasmania (the [SEIS](#)).

The first SEIS was conducted in 2008 and the fifth and most recent [SEIS](#) was completed in 2021 by a consortium comprising the South Australian Centre for Economic Studies (University of Adelaide), ENGINE Group, the Centre of Policy Studies (Victoria University) and Corinna Economic Advisory.

Following the first SEIS in 2008, the Government introduced a range of measures to address problem gambling in the State, including amending the Act (Section 112L) to require the Commission to develop a mandatory code(s) of practice on responsible gambling. Subsequently, the Commission introduced on 1 March 2012 the *Responsible Gambling Mandatory Code of Practice for Tasmania* (Tasmanian Code). It is the principal instrument used to minimise harm by controlling the processes and practices of licensed gambling operations. In developing the Tasmanian Code, the Commission has sought to '*...find a balance between minimising, where possible, the impact on recreational gamblers and minimising the harm from gambling, particularly for people with a gambling problem*'.<sup>11</sup>

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<sup>9</sup> *Gaming Control Act 1993*, Section 125(ea)

<sup>10</sup> Under Section 151(5) of the Gaming Control Act

<sup>11</sup> [Responsible Gambling Mandatory Code of Practice for Tasmania](#), Tasmanian Liquor and Gaming Commission, Version 3.1, March 2020, p1

An overview of how gambling research in other jurisdictions compares to the SEIS can be found in [Appendix B](#).

The Tasmanian Government’s public health response to gambling is through:

- a Gambling Support Program (through the Department of Communities Tasmania) that ‘...provides a public health response to the risks and harms of gambling, through community education, community grants, provision of services for people affected by gambling, policy development and research’<sup>12</sup>
- a Gambling Help Online service (in association with all state and territory governments and the Australian Government)<sup>13</sup>, which includes a 24/7 chat or email-based counselling and support service
- Gamblers Helpline Tasmania, which is a 24-hour free call telephone service<sup>14</sup>
- the gamblers help services are delivered by Anglicare Tasmania and Relationships Australia Tasmania.<sup>15</sup>

## 2.3 Changes Since 2017

Following a review in 2017, a range of improvements were made to the Tasmanian Code as outlined in Table 4, together with consequential changes to the Commission’s Rules.

Table 4: Amendments to Tasmanian Code arising from 2017 review

Code Area	Details	Effective Date
Inducements	New requirement prohibiting inducements between people working in the industry as an incentive for persuading people to gamble.	1 May 2018
	Increase to the maximum value of free vouchers (or tokens and the like) that can be offered for gambling purposes from \$10 to \$15.	1 May 2018
	New requirement limiting EGM jackpot prize amounts that can be won in hotels and clubs (\$25 000 for stand-alone progressive jackpots and \$60 000 for linked jackpots).	1 November 2018
Player loyalty programs	Strengthened minimum standards relating to player activity statements, including prescribing information to be provided relating to a player’s gambling history, requiring statements to be delivered to the member’s home postal address, and increasing the delivery frequency from once a year to twice yearly. Statements can no longer contain gambling advertising or any other irrelevant information, and statements must not be delivered to members who have not gambled within the previous six months (to prevent triggering an urge to gamble).	1 November 2018
	New requirement prohibits all gambling related contact with loyalty program members who have not gambled within the previous six-month activity statement reporting period (to prevent triggering an urge to gamble). All forms of contact are prohibited including	1 November 2018

<sup>12</sup> [Gambling Support Program](#), Department of Communities Tasmania. Accessed 6 September 2021.

<sup>13</sup> [Gambling Help Online](#) website. Accessed 6 September 2021

<sup>14</sup> [Department of Communities Tasmania](#) website. Accessed 6 September 2021

<sup>15</sup> [Department of Communities Tasmania](#) website. Accessed 6 September 2021



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Code Area	Details	Effective Date
	written, telephone, in-person or electronic. Any form of non-gambling communication must not refer to gambling in any way.	
	Increase to the maximum value of rewards that can be offered for gambling purposes from \$10 to \$15.	1 May 2018
Access to cash	Strengthened the EFTPOS cash withdrawal transaction restriction for hotels and clubs limiting \$200 for payment of accommodation; \$200 for payment of main meals served in prescribed areas; and \$100 per customer per day for any other purpose. The restriction no longer applies to bottle shops. <sup>16</sup>	1 May 2018
	New requirement prohibiting cashing of cheques unless an exemption has been approved by the Commission where considered an essential service to that community. The restriction does not apply to international customers.	1 November 2018
	New requirement ensuring that coin change dispensing machines must be in the line of sight of main staffed areas and in the position approved by the Commission.	1 November 2018
Payment of winnings	Strengthened to require cheques provided for the payment of winnings be crossed 'Account Payee Only, Not Negotiable'. New option included which allows payouts being processed through direct bank transfer if requested by the customer and can be accommodated by the venue.	1 May 2018
Service of food and alcohol	New requirement prohibiting the serving of alcohol at any time to customers playing, seated or standing at a gaming machine in hotels and clubs.	1 May 2018

<sup>16</sup> In 2019, the Commission approved an amendment restricting EFTPOS cash withdrawals in hotels/clubs to one transaction, per customer, per day up to a maximum \$200 for any purpose



### 3 Gambling Controls in Australian Jurisdictions

The categorisation schema shown in Table 5 is used to compare the harm minimisation and responsible gambling controls in other jurisdictions with those in the Tasmanian Code.

This schema generates a visual 'heat map' where:

- Shades of blue indicate that the Tasmanian Code controls were broader in scope than those of the compared jurisdiction.
- Shades of red indicate the controls in the Tasmanian Code were narrower in scope than those of the compared jurisdiction or applied to less gaming activities than the comparison jurisdiction.

Table 5: Comparison categorisation schema

5. Key	6. Description
Tas Only	Tasmania has a control and the compared jurisdiction does not
More	Tasmania has a control that is larger in scope
Same	Tasmania and the compared jurisdiction both have the same or similar control
Fewer	Tasmania has a control that is smaller in scope
Omitted	Tasmania does not apply a control to a gambling activity where the compared jurisdiction does
Neither	Neither Tasmania nor the compared jurisdiction have a control for the gambling activity

### 3.1 Australia Government

#### Regulatory Overview

The Australian Government regulates online gambling services and gambling advertising on television, radio or online. This regulation is administered by the Australian Communications and Media Authority (ACMA).

The Australian Government's gambling-related legislative instruments are shown in Table 6.

Table 6: Australian Government Gambling Legislative Instruments

Regulator	Primary Instruments	Subordinate Instruments
Australian Communications and Media Authority	<i>Interactive Gambling Act 2001</i>	<i>Interactive Gambling Regulations 2019</i> <i>Interactive Gambling (Sports Events and Excluded Wagering Services) Determination 2017</i>
	<i>Broadcasting Services Act 1992</i>	<i>Broadcasting Services (Online Content Service Provider Rules) 2018</i>

## Harm Minimisation and Responsible Gambling

The Interactive Gambling Act and Regulations ‘...prohibits the provision and advertising of prohibited interactive gambling services to persons in Australia.’<sup>17</sup>

The Act covers ‘...all gambling that takes place online, through a website or app or via a telephone.’<sup>18</sup> The Act has provisions for voluntary industry codes, such as the *Interactive Gambling Code 2001*.

The Act recognises gambling services that are illegal in Australia and recognises regulated interactive gambling services that can only be offered or promoted to Australians licensed under the law of a state or territory. The Act also contains player protections such as:

- prohibiting the provision of credit to customers of certain interactive wagering services
- prohibiting the provision of licensed interactive wagering services to individuals who are registered in the National Self-exclusion Register (the Register is currently being developed and due to be completed in 2022).

The *Broadcasting Services Act 1992* has provisions for industry codes to be established and registered by the ACMA. These industry codes cover television and radio broadcasting services. Protections in these industry codes of practice include restrictions on the times that gambling advertising can occur and the format of gambling advertising. They also impose obligations to ensure that gambling advertising is socially responsible.

The *Broadcasting Services (Online Content Service Provider Rules) 2018* outline the requirements for ‘...online content service providers who provide gambling promotional content on online content services in conjunction with live coverage of a sporting event.’<sup>19</sup> The harm minimisation and responsible gambling controls include:

- prohibiting gambling promotional content on an online content service in conjunction with live coverage of a sporting event from 5:00am to 8:30pm
- prohibiting gambling promotional content including promotion of odds on an online content service in conjunction with live coverage of a sporting event from 8:30pm to 5:00am
- restricting gambling promotional content during the live coverage of a sporting event to, amongst other things, not be directed to children or portray children as participating in betting or gambling or portray betting or gambling as a family activity.

All Australian Governments have agreed to a National Consumer Protection Framework covering online wagering, which was launched in November 2018 (National Framework). The National Framework has been designed to ‘...empower individuals, and ensure the harm from online wagering is minimised.’<sup>20</sup> The implementation of the National Framework is being overseen by the Australian Department of Social Services. The National Framework contains ten consumer protection measures:<sup>21</sup>

1. Prohibiting online wagering services offering or providing lines of credit to customers

<sup>17</sup> [2<sup>nd</sup> Reading Speech for Interactive Gambling Amendment Bill 2016](#), Hon Alan Tudge, MP, Hansard, 10 November 2016

<sup>18</sup> [About the Interactive Gambling Act](#), Australian Communications and Media Authority website. Accessed 14 October 2021

<sup>19</sup> [Broadcasting Services \(Online Content Service Provider Rules\) 2018](#), p 3

<sup>20</sup> [National Consumer Protection Framework for Online Wagering](#), Department of Social Services Website. Accessed 14 October 2021

<sup>21</sup> [National Consumer Protection Framework for Online Wagering Fact Sheet](#), Department of Social Services Website. Accessed 14 October 2021



2. Preventing wagering providers from advertising payday loans and preventing potential connections between online wagering customers and credit providers
3. Requiring online wagering providers to verify their customers' identity within 14 days of their registration, subject to a review after 12 months to inform reducing this period to 72 hours
4. Prohibiting online wagering providers from offering any credit, voucher, reward, or other benefit as an incentive to open an account or to refer another person to open an account
5. Requiring online wagering providers to give their Australian customers a simple, easy to find, and readily accessible way of closing or cancelling their online wagering account
6. Requiring online wagering providers to provide opt-out pre-commitment schemes to enable consumers to set deposit limits before they start gambling
7. Requiring online wagering providers to provide consumers with activity statements so that they can easily track and monitor their online wagering spending and behaviour
8. Requiring online wagering providers to use evidence-based, consistent gambling messaging about the risks and potential harm of gambling
9. Requiring online wagering providers to train their service staff in the responsible service of online wagering
10. Establishing a national self-exclusion register to enable consumers to exclude themselves from all interactive wagering services via a simple online registration process.

In Tasmania, the National Framework is being implemented by the Tasmanian Liquor and Gaming Commission (under a Ministerial Direction) primarily through amendment to its Tasmanian Gaming Licence Technical Standard.<sup>22</sup> Some elements are also included in the Code and other technical instruments.

### Changes Since 2017

The Interactive Gambling Act was amended in 2017 to clarify the law regarding illegal online gambling services, increase ACMA's enforcement role and strengthen the enforcement mechanisms. The amendments gave effect to the first two measures of the National Framework (prohibiting offering credit and linking to payday lenders). The Australian Government also amended the *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1)* to give effect to the third measure of the National Framework (new customer verification period). The Interactive Gambling Act was further amended in 2018 to prohibit online betting on the outcome of a lottery (including a keno draw). In 2019, a further amendment allowed establishment of the National Self-Exclusion Register (a measure under the National Framework).

### Comparison to Tasmanian Code

Table 7: Key findings – Tasmania Code compared to Australian Government controls

Key Findings
<ul style="list-style-type: none"> <li>• The Tasmanian Code contains controls that support the controls of the Interactive Gambling Act and the objectives of the National Consumer Protection Framework.</li> </ul>

Under the provisions of the Australian Constitution, the controls in the Interactive Gambling Act take precedence over the provisions of State and Territory legislation.

<sup>22</sup> Tasmania has implemented 6 of the National Framework measures, with the remainder to be implemented following completion of research, testing and trialing

The controls that apply to online wagering in the Tasmanian Code are complimentary to the controls in the Interactive Gambling Act and relate to:

- advertising
- inducements
- player loyalty programs
- staff training in recognising people with gambling problems
- information to players.

Liquor and Gaming Branch advises that it is not aware of any inconsistency between the online wagering controls in the Tasmanian Code and the provisions of the Interactive Gambling Act.

The controls under the various national industry codes of practice apply to advertising across television broadcasting and radio broadcasting. The advertising controls in the Tasmanian Code largely complement these codes of practice provisions, with some minor discrepancies in the time at which some controls apply.

## 3.2 Australian Capital Territory

### Regulatory Overview

The ACT Gambling and Racing Commission is an independent body that regulates ‘activities of the casino, gaming machines, lotteries, racing, betting and interactive gambling’.<sup>23</sup>

The legislative instruments that regulate gambling activity in the Australian Capital Territory are shown in Table 8.

Table 8: Australian Capital Territory Gambling Legislative Instruments

Regulator	Primary Instruments	Subordinate Instruments
ACT Gambling and Racing Commission	<i>Casino (Electronic Gaming) Act 2017</i>	<i>Casino (Electronic Gaming) Regulation 2018</i>
	<i>Casino Control Act 2006</i>	<i>Casino Control Regulations 2006</i>
	<i>Gambling and Racing Control Act 1999</i>	<i>Gambling and Racing Control (Code of Practice) Regulation 2002</i>
	<i>Gaming Machine Act 2004</i>	<i>Gaming Machine Regulations 2004</i> <i>Gaming Machine (Offset Amounts) Regulation 2018</i>
	<i>Interactive Gambling Act 1998</i>	<i>Interactive Gambling Regulation 1998</i>
	<i>Lotteries Act 1964</i>	
	<i>Pool Betting Act 1964</i>	
	<i>Race and Sports Bookmaking Act 2001</i>	<i>Race and Sports Bookmaking Regulations 2001</i>
	<i>Racing Act 1999</i>	<i>Racing Regulation 2010</i>

<sup>23</sup> [ACT Gambling and Racing Commission](#) website. Accessed 9 September 2021.

Regulator	Primary Instruments	Subordinate Instruments
	<i>Totalisator Act 2014</i>	<i>Totalisator Rules 2021</i>
	<i>Unlawful Gambling Act 2009</i>	<i>Unlawful Gambling Regulation 2010</i>

## Harm Minimisation and Responsible Gambling

The Gambling and Racing Control (Code of Practice) Regulation (the ACT Code) was developed by the ACT Gambling and Racing Commission and provides mandatory minimum requirements for harm minimisation and responsible gambling within the industry in the ACT. The ACT Code covers the following types of gambling:

- gaming machine licences
- casino gaming
- race and sports bookmaking licensees
- interactive gambling
- some lottery providers.<sup>24</sup>

The location of mandated responsible gambling controls for each gambling activity type are shown in Table 9.

Table 9: Responsible Gambling Controls in the Australian Capital Territory

Gambling Activity	Control Location
Gaming machines	ACT Code of Practice Gaming Machine Act Gaming Machine Regulations Gaming Machine (Cashless Gaming System Operational Requirements — Ticket In Ticket Out) Approval 2015 Casino Control Act
Table gaming	ACT Code of Practice Casino Control Act
Keno	ACT Code of Practice Casino Control Act
Terrestrial wagering	ACT Code of Practice Casino Control Act Totalisator Rules Racing and Sports Bookmaking Regulations
Online wagering	ACT Code of Practice Interactive Gambling Act

<sup>24</sup> [ACT Gambling and Racing Commission](#) website. Accessed 23 September 2021

Gambling Activity	Control Location
	Totalisator Rules
Lotteries	ACT Code of Practice

## Changes Since 2017

Three new legislative instruments came into effect since 2017:

- Gaming Machine (Offset Amounts) Regulation – this sets out financial incentives for clubs to voluntarily surrender gaming machine authorisations as part of the ACT’s *Pathway to 4,000 Gaming Machine Authorisations by 2020* initiative.
- Casino (Electronic Gaming) Act and the Casino (Electronic Gaming) Regulation – these regulate the authorisation to operate casino gaming machines and fully automated table game (FATG) terminals, including requirements for gambling harm minimisation measures that must be in place.

Additionally, amendments were made to the Gaming Machine Act and the ACT Code that directly related to the control of gambling harm minimisation:

- requiring licensees to provide additional information to players (e.g. on deposit limits and betting accounts)
- prohibiting totalisator licensees from offering inducements to open a betting account
- clarifying where gambling help messaging needs to be placed on gaming machines.

The amendments to the Gaming Machine Act were to ‘...reduce red tape and improve the operation of certain provisions...’<sup>25</sup>, whereas the amendments to the ACT Code were to ‘...implement measures from the National Consumer Protection Framework (NCPF) for Online Wagering...’<sup>26</sup>

Further detail on these changes is contained in [Appendix C](#).

## Comparison to Tasmanian Code

Table 10: Key findings – Tasmania Code compared to ACT controls

Key Findings
<ul style="list-style-type: none"> <li>• The comparison of the Tasmanian Code and the ACT controls shows that: <ul style="list-style-type: none"> <li>– The Tasmanian Code has 33 controls that are not prescribed by the ACT for any gambling activity</li> <li>– The Tasmanian Code has 4 controls that are broader than the ACT controls – these are in relation to inducements, player loyalty programs and access to cash</li> <li>– The ACT has 3 controls that are broader than the Tasmanian Code – these are in relation to access to cash and payment of winnings</li> <li>– The Tasmanian Code has 7 controls that the ACT also applies to other gambling activities – these are in relation to advertising, inducements, lighting, clocks and staff training.</li> </ul> </li> </ul>

<sup>25</sup> [Gambling Legislation Amendment Bill 2018 Explanatory Statement](#), p 4

<sup>26</sup> [Gambling and Racing Control \(Code of Practice\) Amendment Regulation 2019 \(No 1\) Explanatory Statement](#), p 2

## Key Findings

- The ACT has additional controls that are either not in the Tasmanian Code or fall outside the scope of the Tasmanian Code, covering areas such as advertising, inducements, payment of winnings and information to players.

A comparison with ACT harm minimisation and responsible gambling controls (see Table 11) indicates that the Tasmanian Code contains more controls than the Australian Capital Territory. It also revealed that the Tasmanian Code has fewer or no controls compared to the Australian Capital Territory in the following areas:

- Unlike at Tasmanian Casinos, the ACT has controls which do not allow a cash facility (an ATM, EFTPOS facility or any other facility for accessing cash or credit) to be provided in the casino.
- There are several controls in the ACT that are similar to those in the Tasmanian Code but apply to different or additional gambling activities. This occurs in:
  - advertising (Tasmanian Code section 1.20)
  - inducements (2.5, 2.6)
  - lighting (6.1)
  - clocks in gambling areas (8.2)
  - staff training in recognising people with gambling problems (9.2, 9.3).
- The Australian Capital Territory has a more stringent control regarding the cash payment of gaming machine winnings by setting the cash withdrawal maximum limit to \$300, in comparison to the \$1000 set in the Tasmanian Code.
- Australian Capital Territory gaming machine licensees must comply with several controls that have no equivalent in the Tasmanian Code, including:
  - not allowing external signs that advertise gaming machines or promote gambling on the licensee's premises
  - not promoting or offering inducements that encourage people to increase their intensity of betting.
- Excluded persons in the Australian Capital Territory can have winnings withheld as licensees cannot knowingly pay winnings to them. In Tasmania, all winnings must be paid out.
- The Australian Capital Territory controls outline requirements for wagering that are not addressed in the Tasmanian Code which include not allowing:
  - advertisements to be published which directly relate to the conduct of a totalisator
  - race bookmakers to supply telephone information about betting fluctuations of the Bookmakers Pricing Service.

Further information on these differences can be found in [Appendix D](#).



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Table 11: Comparing Tasmania Code to Australian Capital Territory controls

Legend					
Tas Only	More	Same	Fewer	Omitted	Neither
<i>Tas has controls and other jurisdiction does not</i>	<i>Tas has more controls</i>	<i>Tas has same/similar controls</i>	<i>Tas has fewer controls</i>	<i>Tas has no controls and other jurisdiction does</i>	<i>Neither jurisdiction has controls</i>

Please refer to the Tasmanian Code in [Appendix A](#) when reviewing the heat map below.

Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>1. Advertising</b>						
1.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.2	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.3	Tas Only	Tas Only	Tas Only	Tas Only	Same	Tas Only
1.4	Same	Same	Same	Same	Same	Same
1.5	Same	Same	Same	Same	Same	Same
1.6	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.7	Same	Same	Same	Same	Same	Same
1.8	Same	Same	Same	Same	Same	Same
1.9	Same	Same	Same	Same	Same	Same
1.10	Same	Same	Same	Same	Same	Same
1.11	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.12	Same	Same	Same	Same	Same	Same
1.13	Same	Same	Same	Same	Same	Same
1.14	Same	Same	Same	Same	Same	Same
1.15	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.16	Tas Only	Tas Only	Tas Only	Tas Only	Same	Tas Only
1.17	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
1.18	Tas Only	Neither	Neither	Neither	Neither	Neither
1.19	Neither	Neither	Neither	Neither	Tas Only	Neither
1.20	Omitted	Omitted	Omitted	Omitted	Same	Neither



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>2. Inducements</b>						
2.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
2.2	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
2.3	More	Tas Only	Tas Only	Tas Only	Neither	Tas Only
2.4	Neither	Neither	Neither	Neither	Same	Neither
2.5	Same	Same	Same	Same	Omitted	Same
2.6	Same	Same	Same	Same	Omitted	Omitted
2.7	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Tas Only
2.8	Tas Only	Neither	Neither	Neither	Neither	Neither
<b>3. Player loyalty programs</b>						
3.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.2	Neither	Neither	Neither	Neither	Neither	Tas Only
3.3	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.4	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.5	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.6	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.7	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.8	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.9	Same	Same	Same	Same	Tas Only	Tas Only
3.10	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.11	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.12	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.13	More	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.14	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
<b>4. Access to cash</b>						
4.1	Same	Same	Tas Only	Tas Only	Neither	Neither
4.2	Fewer	Fewer	Fewer	Fewer	Neither	Neither



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
4.3	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.4	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.5	Same	Tas Only	Tas Only	Tas Only	Neither	Neither
4.6	More	More	More	More	Neither	Neither
4.7	More	More	More	More	Neither	Neither
4.8	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.9	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
<b>5. Payment of winnings</b>						
5.1	Fewer	Neither	Tas Only	Neither	Neither	Neither
5.2	Fewer	Neither	Tas Only	Neither	Neither	Neither
5.3	Tas Only	Neither	Tas Only	Neither	Neither	Neither
5.4	Tas Only	Neither	Tas Only	Neither	Neither	Neither
<b>6. Lighting</b>						
6.1	Same	Same	Omitted	Omitted	Omitted	Omitted
<b>7. Service of food and alcohol</b>						
7.1	Tas Only	Neither	Neither	Neither	Neither	Neither
7.2	Same	Neither	Neither	Neither	Neither	Neither
7.3	Same	Same	Same	Same	Neither	Tas Only
<b>8. Clocks in gambling areas</b>						
8.1	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
8.2	Same	Same	Same	Same	Omitted	Omitted
<b>9. Staff training in recognising people with gambling problems</b>						
9.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
9.2	Neither	Neither	Neither	Same	Same	Omitted
9.3	Same	Omitted	Omitted	Omitted	Omitted	Omitted
9.4	Same	Same	Same	Same	Same	Same



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>10. Information to players</b>						
10.1 (a)	Same	Same	Same	Same	Same	Same
10.1 (b)	Same	Same	Same	Same	Same	Same
10.1 (c)	Same	Same	Same	Same	Same	Neither
10.1 (d)	Same	Same	Same	Same	Same	Same
10.2	Same	Same	Same	Same	Neither	Neither
10.3	Neither	Neither	Neither	Neither	Neither	Same
10.4	Tas Only	Tas Only	Tas Only	Same	Same	Tas Only

### 3.3 New South Wales

#### Regulatory Overview

Liquor and Gaming NSW within the Department of Customer Service oversees all gambling activity except for community gaming (i.e. lotteries and sweeps), which is overseen by NSW Fair Trading.

The Independent Liquor & Gaming Authority operates to determine licensing proposals, disciplinary action taken against licensees, and review delegated decisions made under Liquor and Gaming NSW.

The Office of Responsible Gambling, which sits within the Better Regulation Division of the Department of Customer Service, *'develops and implements programs and initiatives, as part of a strategic approach that supports responsible gambling and prevents and minimises the risk of gambling related harm in the community'*.<sup>27</sup>

NSW's gambling-related legislative instruments are shown in Table 12.

Table 12: NSW Gambling Legislative Instruments

Regulator	Primary Instruments	Subordinate Instruments
Liquor and Gaming NSW, Department of Customer Service	<i>Betting and Racing Act 1998</i>	<i>Betting and Racing Regulation 2012</i>
	<i>Betting Tax Act 2001</i>	
	<i>Casino Control Act 1992</i>	<i>Casino Control Regulation 2019</i>
	<i>Gambling (Two-up) Act 1998</i>	
	<i>Gaming and Liquor Administration Act 2007</i>	<i>Gaming and Liquor Administration Regulation 2016</i>
	<i>Gaming Machine Tax Act 2001</i>	

<sup>27</sup> [Office of Responsible Gambling](#) website. Accessed 7 September 2021

Regulator	Primary Instruments	Subordinate Instruments
	<i>Gaming Machines Act 2001</i>	<i>Gaming Machines Regulation 2019</i>
	<i>Public Lotteries Act 1996</i>	<i>Public Lotteries Regulation 2016</i>
	<i>Registered Clubs Act 1976</i>	<i>Registered Clubs Regulation 2015</i>
	<i>Totalizator Act 1997</i>	<i>Totalizator Regulation 2012</i>
	<i>Unlawful Gambling Act 1998</i>	<i>Unlawful Gambling Regulation 2021</i>
NSW Fair Trading, Department of Customer Service	<i>Community Gaming Act 2018</i>	<i>Community Gaming Regulation 2020</i>

### Harm Minimisation and Responsible Gambling

Regulatory controls relating to harm minimisation and responsible gambling in NSW are spread throughout Acts and Regulations. It does not have a mandatory code of practice like the Tasmanian Code.

For gaming machine venues, section 48 of the Gaming Machines Act does allow for industry codes of practice to be approved. These codes are to provide *'practical guidance for the promotion of responsible practices and conduct in relation to approved gaming machines in hotels and on the premises of clubs'*.<sup>28</sup> There is no mandate in place that requires a gambling provider to have an approved industry code.

Codes approved under this section of the Act include:

- the Star Entertainment Group Responsible Gambling Code of Conduct
- ClubsNSW Club Code of Practice
- Tatts Lotteries Responsible Gambling Code of Conduct.

The location of mandated responsible gambling controls for each gambling activity type are shown in Table 13.

Table 13: Responsible Gambling Controls in NSW

Gambling Activity	Control Location
Gaming machines	Gaming Machines Act Gaming Machines Regulation Casino Control Act Casino Control Regulation
Table gaming	Casino Control Act Casino Control Regulation

<sup>28</sup> [Gaming Machines Act 2001](#), Section 48

Gambling Activity	Control Location
Keno	Community Gaming Act Community Gaming Regulation Public Lotteries Act Public Lotteries Regulation
Terrestrial wagering	Betting and Racing Act Betting and Racing Regulation Totalizator Act Totalizator Regulation
Online wagering	Betting and Racing Act Betting and Racing Regulation Totalizator Act Totalizator Regulation
Lotteries	Community Gaming Act Community Gaming Regulation Public Lotteries Act Public Lotteries Regulation

## Changes Since 2017

Since 2017, there have been both administrative and harm minimisation amendments to gambling legislation in NSW. The administrative amendments include:

- Liquor and Gaming NSW moved from the Department of Justice to the Department of Customer Service. This change happened in 2019 when the Department of Justice was merged into the new Department of Communities and Justice. These changes were made as a part of a greater reorganisation to *'...help the [public] sector deliver on the Premier's Priorities by streamlining how related agencies operate and collaborate.'*<sup>29</sup>
- The Office of Responsible Gambling was established in 2018 to develop and implement *'...programs and initiatives, as part of a strategic approach that supports responsible gambling and prevents and minimises the risk of gambling related harm in the community.'*<sup>30</sup>
- The Community Gaming Act came into effect on the 1 July 2020 and governs the conduct of gaming activities undertaken for charitable, social, not-for-profit or trade promotion purposes. This new Act repealed the *Lotteries and Art Unions Act 1901* and the *Lotteries and Art Unions Regulations 2004*. The purpose of these changes was to *'...provide a framework for the regulation of gaming activities for community or charitable purposes and trade promotion purposes'*.<sup>31</sup>

<sup>29</sup> [State of the NSW Public Sector Report 2019](#), p 22

<sup>30</sup> [About us](#), Office of Responsible Gambling website. Accessed 9 November 2021

<sup>31</sup> [Community Gaming Bill 2019 Explanatory Note](#), p 1



- The Casino Control, Gaming Machines and Unlawful Gambling regulations were repealed and replaced by new versions as they were due to be repealed by section 10(2) of the *Subordinate Legislation Act 1989*.<sup>32 33 34</sup>

Introduced to Parliament in 2018 was a suite of sixteen pieces of legislation that ‘...represented the most significant set of reforms to New South Wales gaming regulation in more than 10 years.’<sup>35</sup> Consequently, several gambling harm minimisation controls were added to several Acts and their associated regulations, including:

- *Casino Control Act 1992*
- *Gaming Machines Act 2001*
- *Betting and Racing Act 1998*
- *Totalizator Act 1997*.

The additional gambling harm minimisation controls include:

- the circumstances for providing complementary chips to patrons
- restricting the number of gaming machines in certain areas
- prohibiting gambling-related advertisements and gambling inducements at racecourses
- restrictions regarding totalizator advertisements.

The rationale for these changes was ‘...ensuring that regulators have the right tools to intervene to address misconduct where it arises and to minimise gambling-related harms.’<sup>36</sup> Furthermore, these reforms reflect ‘...a number of review processes conducted over the past year or more involving input from the community, local government and industry.’<sup>37</sup>

Subsequently, there were several gambling harm minimisation controls that were added, the most consequential of which were added to the *Betting and Racing Act 1998* and *Totalizator Act 1997* (and associated regulations) and include:

- placing restrictions on direct marketing to account holders
- prohibiting inducements to open betting accounts
- prohibiting the provision of alcohol to induce people to play totalisators

These gambling harm minimisation changes were introduced for several reasons including:

- implementing stage one changes arising from the National Consumer Framework for Online Wagering<sup>38</sup>
- responding to the findings from the 2019 Court of Criminal Appeal decision in *Ladbrokes Digital Australia Pty Ltd v Liquor & Gaming NSW*.<sup>39</sup>

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<sup>32</sup> [Unlawful Gambling Regulation 2016](#), p1

<sup>33</sup> [Gaming Machines Regulation 2019](#), p 1

<sup>34</sup> [Casino Control Regulation 2019](#), p 1

<sup>35</sup> [2<sup>nd</sup> Reading Speech for Liquor and Gaming Legislation Amendment Bill 2018, Casino Control Amendment Bill 2018 Gaming Machines Amendment \(Leasing and Assessment\) Bill 2018 and Registered Clubs Amendment \(Accountability and Amalgamations\) Bill 2018](#), Hon Niall Blair, MLC, 14 March 2018

<sup>36</sup> Ibid

<sup>37</sup> Ibid

<sup>38</sup> [2<sup>nd</sup> Reading Speech for Gambling Legislation Amendment \(Online and Other Betting\) Bill 2019](#), Hon Scott Farlow, MLC, 07 August 2019

<sup>39</sup> Ibid

Further detail on these changes is contained in [Appendix C](#).

## Comparison to Tasmanian Code

Table 14: Key findings – Tasmania Code compared to NSW controls

Key Findings
<ul style="list-style-type: none"> <li>• The comparison of the Tasmanian Code and the NSW controls shows that:           <ul style="list-style-type: none"> <li>– The Tasmanian Code has 31 controls that are not prescribed by NSW for any gambling activity</li> <li>– The Tasmanian Code has 10 controls that are broader than the NSW controls – these are in relation to advertising, inducements, player loyalty programs, access to cash, payment of winnings, staff training and information to players.</li> <li>– NSW has 20 controls that are broader than the Tasmanian Code – these are in relation to advertising and inducements               <ul style="list-style-type: none"> <li>◆ Notably, 18 of those controls are broader because gaming machine advertising is prohibited in NSW.</li> </ul> </li> <li>– The Tasmanian Code has 3 controls that NSW also applies to other gambling activities – these are in relation to advertising and payment of winnings</li> </ul> </li> <li>• NSW has additional controls that are either not in the Tasmanian Code or fall outside the scope of the Tasmanian Code, covering areas such as advertising and inducements.</li> </ul>

A comparison with NSW harm minimisation and responsible gambling controls (see Table 15) indicates that the Tasmanian Code contains significantly more controls. It also revealed that the Tasmanian Code has fewer or no controls compared to NSW in the following areas:

- The Gaming Machines Regulation prohibits any gaming machine advertising, which far exceeds the controls placed on gaming machine advertising in Tasmania.
- Hotels and clubs in NSW cannot offer, or cause to be offered, players any free credits as an inducement to gamble, where Tasmania allows credits up to \$15 in value to be offered.
- Where the Tasmanian Code has an exemption for the offering of alcohol as an inducement to play in casinos, NSW prohibits it completely.
- Gambling-related signs cannot be placed outside a casino nor can a casino employee physically offer inducements to people passing nearby the casino.
- There are several controls in NSW that are similar to those in the Tasmanian Code but apply to different or additional gambling activities. This occurs in:
  - advertising (Tasmanian Code section 1.19, 1.20)
  - payment of winnings (5.2).

Further information on these differences can be found in [Appendix D](#).

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Table 15: Comparing Tasmania Code to NSW controls

Legend					
Tas Only	More	Same	Fewer	Omitted	Neither
<i>Tas has controls and other jurisdiction does not</i>	<i>Tas has more controls</i>	<i>Tas has same/similar controls</i>	<i>Tas has fewer controls</i>	<i>Tas has no controls and other jurisdiction does</i>	<i>Neither jurisdiction has controls</i>

Please refer to the Tasmanian Code in [Appendix A](#) when reviewing the heat map below.

Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>1. Advertising</b>						
1.1	Fewer	Same	Tas Only	Same	Same	Tas Only
1.2	Fewer	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.3	Fewer	Same	Tas Only	Same	Same	Tas Only
1.4	Fewer	Same	Same	Same	Same	Same
1.5	Fewer	Same	Tas Only	Same	Same	Same
1.6	Fewer	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.7	Fewer	Same	Tas Only	Tas Only	Tas Only	Tas Only
1.8	Fewer	Same	Tas Only	Same	Same	Tas Only
1.9	Fewer	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.10	Fewer	More	Tas Only	More	More	More
1.11	Fewer	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.12	Fewer	Same	Tas Only	Same	Same	Same
1.13	Fewer	Same	Tas Only	Same	Same	Tas Only
1.14	Fewer	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.15	Fewer	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.16	Fewer	Tas Only	Same	Tas Only	Tas Only	Same
1.17	Fewer	Tas Only	Tas Only	More	More	Neither
1.18	Fewer	Neither	Neither	Neither	Neither	Neither
1.19	Omitted	Neither	Neither	Neither	Tas Only	Neither
1.20	Omitted	Neither	Neither	Neither	Tas Only	Neither



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>2. Inducements</b>						
2.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
2.2	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
2.3	Fewer	Tas Only	Tas Only	Tas Only	Neither	Tas Only
2.4	Neither	Neither	Neither	Neither	Same	Neither
2.5	Same	Fewer	Tas Only	Same	Neither	Tas Only
2.6	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
2.7	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Tas Only
2.8	More	Neither	Neither	Neither	Neither	Neither
<b>3. Player loyalty programs</b>						
3.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.2	Neither	Neither	Neither	Neither	Neither	Tas Only
3.3	Tas Only	Tas Only	Tas Only	More	More	Tas Only
3.4	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.5	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.6	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.7	Same	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.8	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.9	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.10	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.11	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.12	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.13	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.14	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
<b>4. Access to cash</b>						
4.1	Same	Tas Only	Tas Only	Tas Only	Neither	Neither
4.2	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
4.3	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.4	Same	Same	Tas Only	Same	Neither	Neither
4.5	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.6	More	More	Tas Only	Tas Only	Neither	Neither
4.7	More	Tas Only	Tas Only	Tas Only	Neither	Neither
4.8	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.9	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
<b>5. Payment of winnings</b>						
5.1	More	Neither	Tas Only	Neither	Neither	Neither
5.2	Tas Only	Omitted	Tas Only	Neither	Neither	Omitted
5.3	Tas Only	Neither	Tas Only	Neither	Neither	Neither
5.4	Same	Same	Tas Only	Neither	Neither	Neither
<b>6. Lighting</b>						
6.1	Tas Only	Tas Only	Neither	Neither	Neither	Neither
<b>7. Service of food and alcohol</b>						
7.1	Tas Only	Neither	Neither	Neither	Neither	Neither
7.2	Tas Only	Neither	Neither	Neither	Neither	Neither
7.3	Tas Only	Same	Tas Only	Tas Only	Neither	Tas Only
<b>8. Clocks in gambling areas</b>						
8.1	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
8.2	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
<b>9. Staff training in recognising people with gambling problems</b>						
9.1	Tas Only	Same	Tas Only	Tas Only	Tas Only	Neither
9.2	Neither	Neither	Neither	Tas Only	Tas Only	Neither
9.3	More	Neither	Neither	Neither	Neither	Neither
9.4	More	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only

Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>10. Information to players</b>						
10.1 (a)	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
10.1 (b)	Same	Same	Same	Same	Same	Same
10.1 (c)	Same	Same	Tas Only	Tas Only	Tas Only	Neither
10.1 (d)	Same	Same	Same	Same	Same	Same
10.2	More	More	Tas Only	Same	Neither	Neither
10.3	Neither	Neither	Neither	Neither	Neither	Tas Only
10.4	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only

## 3.4 Northern Territory

### Regulatory Overview

Gambling in the Northern Territory is regulated within the Department of Industry, Tourism and Trade by:

- the Northern Territory Racing Commission, which oversees racing-related gambling activities
- Licensing NT, which oversees all other gambling activities.

The Northern Territory's gambling-related legislative instruments are shown in Table 16.

Table 16: Northern Territory Gambling Legislative Instruments

Regulator	Primary Instruments	Subordinate Instruments
Licensing NT, Department of Industry, Tourism and Trade	<i>Gaming Control Act 1993</i>	<i>Gaming Control (Community Gaming) Regulations 2006</i> <i>Gaming Control (Gaming Machines) Regulations 1995</i> <i>Gaming Control (Internet Gaming) Regulations 1998</i> <i>Gaming Control (Licensing) Regulations 1995</i> <i>Gaming Control (Reviewable Decisions) Regulations 2014</i> <i>Gaming Control (Taxes and Levies) Regulations 2015</i>
	<i>Gaming Machine Act 1995</i>	<i>Gaming Machine Regulations 1995</i> <i>Gaming Machines Rules 2001</i>
	<i>Soccer Football Pools Act 1978</i>	<i>Soccer Football Pools Regulations 1985</i>

Regulator	Primary Instruments	Subordinate Instruments
		<i>The Pools Rules</i> <i>Rules of Authorised Lotteries</i>
	<i>Totalisator Licensing and Regulation Act 2004</i>	<i>Totalisator Licensing and Regulation (Arbitration) Regulations 2000</i> <i>Totalisator Licensing and Regulation Regulations 2000</i>
	<i>Unlawful Betting Act 2004</i>	
Racing Commission, Department of Industry, Tourism and Trade	<i>Racing and Betting Act 1983</i>	<i>Racing and Betting Regulations 1984</i> <i>Greyhound Racing Rules 1981</i> <i>Totalisator Rules 1979</i>

### Harm Minimisation and Responsible Gambling

There are three mandatory codes of practice that are the primary instruments that establish harm minimisation and responsible gambling controls in the Northern Territory:

- the *Code of Practice for Responsible Gambling* applies to gambling activities regulated under the Gaming Control Act, Gaming Machine Act, Racing and Betting Act and the Soccer Football Pools Act
- the *Code of Practice for Responsible Service of Online Gambling 2019* applies to online gambling activities regulated under the Racing and Betting Act
- the *Code of Practice for Responsible Online Gambling* applies to all other online gambling activities.

Some additional gambling harm minimisation controls are also found in the Acts, Regulations and Rules.

The location of mandated responsible gambling controls for each gambling activity type are shown in Table 17.

Table 17: Responsible Gambling Controls in the Northern Territory

Gambling Activity	Control Location
Gaming machines	Gaming Control Act Gaming Machine Act Gaming Machine Rules Code of Practice for Responsible Gambling
Table gaming	Code of Practice for Responsible Gambling
Keno	Code of Practice for Responsible Gambling
Terrestrial wagering	Totalisator Licensing and Regulation Act Code of Practice for Responsible Gambling



Gambling Activity	Control Location
Online wagering	Gaming Control (Internet Gaming) Regulations Totalisator Licensing and Regulation Act Code of Practice for Responsible Online Gambling Code of Practice for Responsible Service of Online Gambling
Lotteries	Gaming Control Act Gaming Control (Community Gaming) Regulations Code of Practice for Responsible Gambling

### Changes Since 2017

The only significant change to gambling legislation since 2017 was the repeal of the *Licensing (Director-General) Act 2014*. The functions of the Northern Territory Licensing Commission were transferred to Licensing NT.

This change was a consequence of reforms to the Northern Territory's alcohol regulation system which resulted in the repeal of the statutory office of Director-General (who was responsible for regulating alcohol and gambling, among other activities) and establishing a Director position as statutory office holder for each activity. For gambling this was the Director of Gaming Control within Licensing NT.<sup>40</sup>

There have been no legislative amendments that have had an impact on gambling harm minimisation controls.

### Comparison to Tasmanian Code

Table 18: Key findings – Tasmania Code compared to NT controls

Key Findings
<ul style="list-style-type: none"> <li>• The comparison of the Tasmanian Code and the NT controls shows that: <ul style="list-style-type: none"> <li>– The Tasmanian Code has 43 controls that are not prescribed by the NT for any gambling activity</li> <li>– The Tasmanian Code has 3 controls that are broader than the NT controls – these are in relation to access to cash, lighting and information to players</li> <li>– The NT has 2 controls that are broader than the Tasmanian Code – these are in relation to advertising</li> <li>– The Tasmanian Code has 9 controls that the NT also applied to other gambling activities – these are in relation to access to cash, payment of winnings, lighting, service of food and alcohol and clocks.</li> </ul> </li> <li>• The NT has additional controls that are either not in the Tasmanian Code or fall outside the scope of the Tasmanian Code, covering areas such as inducements, access to cash, child care facilities, community interaction, gambling premises and gambling research.</li> </ul>

<sup>40</sup> [Legislation Scrutiny Committee - Public Briefing Transcript](#), Northern Territory Legislative Assembly, 9 December 2019

A comparison with NT harm minimisation and responsible gambling controls (see Table 19) indicates that the Tasmanian Code contains significantly more controls than the NT. It also revealed that the Tasmanian Code has fewer or no controls compared to the NT in the following areas:

- The NT has more a more stringent control than the Tasmanian Code for the advertising player information, specifically *'Advertising of individuals' winnings paid should only be displayed within the gambling provider's premises and not externally in public spaces. Personal particulars of winners are only to be published with their consent.*<sup>41</sup>
- The NT has a control regarding lotteries that has no equivalent in the Tasmanian Code, that outlines a person should not *'print, publish or distribute...or have in his or her possession for publication or distribution... a list, whether complete or not, of prize winners or winning tickets in...'*<sup>42</sup>
- There are several controls in the NT that are similar to those in the Tasmanian Code but apply to different or additional gambling activities. This occurs in:
  - access to cash (Tasmanian Code sections 4.1, 4.3, 4.4, 4.6, 4.9)
  - payment of winnings (5.2)
  - lighting (6.1)
  - service of food and alcohol (7.3)
  - clocks in gambling areas (8.2).
- The NT prohibits sending advertising material to excluded persons, and prohibits sending it to those who request that it not be sent.
- Unlike in the Tasmanian Code, gaming providers in the NT that offer gaming machines, table gaming, terrestrial wagering and lotteries must ensure that any childcare facilities provided are appropriately accredited and that *'...children cannot see gambling activities taking place.'*<sup>43</sup>
- Online wagering operators in the NT have some controls that have no equivalent in the Tasmanian Code and include:
  - ensuring they have an appropriate level of management to provide services such as assisting clients, providing assistance to gambling affected clients and staff and establish policies to allow customers to impose gambling limits.
- As opposed to the Tasmanian Code, there is a NT control that requires commercial gambling providers (who operate all gaming activities except online wagering) to appoint a community liaison officer to provide support and information to patrons and staff for gambling related problems, among other duties.
- Lotteries conducted by approved associations have controls in the NT that are not in the Tasmanian Code and include:
  - a maximum prize for attendance or membership lotteries greater than \$10 000
  - a maximum prize for mini-lotto or a tipping competition greater than \$5 000.
- Gaming machine providers in the NT are required to participate in gambling research and evaluation and ensure that any activities run by them for minors does *'...not promote any*

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<sup>41</sup> [Code of Practice for Responsible Gambling 2016](#), p 8

<sup>42</sup> [Gaming Control Act 1993](#), p 20

<sup>43</sup> [Code of Practice for Responsible Gambling 2016](#), p 7



*aspect of gambling and should not be conducted in close proximity to gambling activities.*<sup>44</sup>  
There are no equivalent controls in the Tasmanian Code.

Further information on these differences can be found in [Appendix D](#).

Table 19: Comparing Tasmania Code to NT controls

Legend					
Tas Only	More	Same	Fewer	Omitted	Neither
<i>Tas has controls and other jurisdiction does not</i>	<i>Tas has more controls</i>	<i>Tas has same/similar controls</i>	<i>Tas has fewer controls</i>	<i>Tas has no controls and other jurisdiction does</i>	<i>Neither jurisdiction has controls</i>

Please refer to the Tasmanian Code in [Appendix A](#) when reviewing the heat map below.

Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>1. Advertising</b>						
1.1	Same	Same	Same	Same	Same	Same
1.2	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.3	Same	Tas Only	Tas Only	Same	Same	Tas Only
1.4	Same	Same	Same	Same	Same	Same
1.5	Same	Same	Same	Same	Same	Same
1.6	Same	Same	Same	Same	Same	Same
1.7	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.8	Same	Same	Same	Same	Same	Same
1.9	Same	Same	Same	Same	Same	Same
1.10	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.11	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.12	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.13	Tas Only	Tas Only	Tas Only	Tas Only	Same	Tas Only
1.14	Fewer	Fewer	Fewer	Fewer	Fewer	Fewer
1.15	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.16	Fewer	Fewer	Fewer	Fewer	Same	Fewer
1.17	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither

<sup>44</sup> Ibid, p 7



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
1.18	Tas Only	Neither	Neither	Neither	Neither	Neither
1.19	Neither	Neither	Neither	Neither	Tas Only	Neither
1.20	Neither	Neither	Neither	Neither	Same	Neither
<b>2. Inducements</b>						
2.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
2.2	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
2.3	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Tas Only
2.4	Neither	Neither	Neither	Neither	Tas Only	Neither
2.5	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Tas Only
2.6	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
2.7	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Tas Only
2.8	Tas Only	Neither	Neither	Neither	Neither	Neither
<b>3. Player loyalty programs</b>						
3.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.2	Neither	Neither	Neither	Neither	Neither	Tas Only
3.3	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.4	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.5	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.6	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.7	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.8	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.9	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.10	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.11	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.12	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.13	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.14	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>4. Access to cash</b>						
4.1	More	More	More	More	Neither	Omitted
4.2	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.3	Same	Same	Same	Same	Neither	Omitted
4.4	Same	Same	Same	Same	Neither	Omitted
4.5	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.6	Same	Tas Only	Same	Same	Neither	Omitted
4.7	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.8	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.9	Tas Only	Tas Only	Tas Only	Tas Only	Omitted	Neither
<b>5. Payment of winnings</b>						
5.1	Same	Neither	Tas Only	Neither	Neither	Neither
5.2	Same	Neither	Same	Omitted	Neither	Omitted
5.3	Tas Only	Neither	Tas Only	Neither	Neither	Neither
5.4	Tas Only	Neither	Tas Only	Neither	Neither	Neither
<b>6. Lighting</b>						
6.1	More	More	Neither	Neither	Neither	Omitted
<b>7. Service of food and alcohol</b>						
7.1	Tas Only	Neither	Neither	Neither	Neither	Neither
7.2	Tas Only	Neither	Neither	Neither	Neither	Neither
7.3	Same	Same	Same	Same	Omitted	Same
<b>8. Clocks in gambling areas</b>						
8.1	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
8.2	Same	Same	Same	Same	Neither	Omitted
<b>9. Staff training in recognising people with gambling problems</b>						
9.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
9.2	Neither	Neither	Neither	Tas Only	Tas Only	Neither

Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
9.3	Tas Only	Neither	Neither	Neither	Neither	Neither
9.4	Same	Same	Same	Same	Same	Same
<b>10. Information to players</b>						
10.1 (a)	Same	Same	Same	Same	Same	Same
10.1 (b)	Same	Same	Same	Same	Same	Same
10.1 (c)	Same	Same	Same	Same	Same	Neither
10.1 (d)	Same	Same	Same	Same	Same	Same
10.2	Same	Same	Same	Same	Neither	Neither
10.3	Neither	Neither	Neither	Neither	Neither	Same
10.4	More	More	More	More	Same	More

## 3.5 Queensland

### Regulatory Overview

All gambling in Qld is regulated through the Office of Liquor and Gaming Regulation within the Department of Justice and Attorney-General.

Qld's gambling-related legislative instruments are shown in Table 20.

Table 20: Qld Gambling Legislative Instruments

Regulator	Primary Instruments	Subordinate Instruments
Office of Liquor and Gaming Regulation, Department of Justice and Attorney-General	<i>Casino Control Act 1982</i>	<i>Casino Control Regulation 1999</i> <i>Gaming Tax Notice 2020</i> <i>Casino Gaming Rule</i>
	<i>Breakwater Island Casino Agreement Act 1984</i>	
	<i>Brisbane Casino Agreement Act 1992</i>	
	<i>Cairns Casino Agreement Act 1993</i>	
	<i>Jupiter's Casino Agreement Act 1983</i>	
	<i>Queen's Wharf Brisbane Act 2016</i>	
	<i>Charitable and Non-Profit Gaming Act 1999</i>	<i>Charitable and Non-Profit Gaming Regulation 1999</i> <i>Charitable and Non-Profit Gaming Rule</i>

Regulator	Primary Instruments	Subordinate Instruments
	<i>Gaming Machine Act 1991</i>	<i>Gaming Machine Regulation 2002</i> <i>Gaming Tax Notice 2020</i> <i>Gaming Tax Notice (No. 2) 2020</i>
	<i>Interactive Gambling (Player Protection) Act 1998</i>	<i>Interactive Gambling (Player Protection) Regulation 1998</i>
	<i>Keno Act 1996</i>	<i>Keno Regulation 2007</i> <i>Keno Rule</i>
	<i>Lotteries Act 1997</i>	<i>Lotteries Regulation 2007</i> <i>Lotteries Rule</i>
	<i>Wagering Act 1998</i>	<i>Wagering Regulation 1999</i> <i>Wagering Rule</i>

## Harm Minimisation and Responsible Gambling

Regulatory controls relating to harm minimisation and responsible gambling in Qld are spread throughout Acts and Regulations.

The *Policy Direction for Gambling in Queensland* outlines the Queensland Government's approach to gambling regulation:

*'The Government recognises that the vast majority of Queenslanders enjoy gambling as a harmless recreational activity. However, a small percentage of players develop problems attributed to gambling activities, problems that can severely affect those individuals and their families.'*<sup>45</sup>

To this end, the Queensland Responsible Gambling Code of Practice (Qld Code) was developed by the Queensland Responsible Gambling Advisory Committee (RGAC), with consultation from the community and key stakeholders. The RGAC is a partnership between community, industry and Government and gambling support providers, industry peak bodies, community groups and Government. It provides advice on responsible and problem gambling-related issues to the Minister responsible for gambling in Qld.

While committing to the Qld Code is voluntary for gambling providers, the Code provides licensees with guidelines as to what to include in their own codes of practice:

*'All gambling providers within Queensland are responsible for ensuring their commitment with the relevant practices contained in the Code of Practice. Each gambling provider will maintain appropriate records relating to the practices in the Code of Practice.'*

*While commitment to the Code of Practice is voluntary, there are practices that are also a legislative requirement. These practices must be complied with according to relevant legislation.'*<sup>46</sup>

<sup>45</sup> [Policy Direction for Gambling in Queensland](#), Department of Justice and Attorney-General, Queensland Government, 2000, p4.

<sup>46</sup> [Queensland Responsible Gambling Code of Practice](#), page 3

The controls in the Qld Code are divided into six practices:

- provision of information
- interaction with customers and community
- exclusion provisions
- physical environment
- financial transactions
- advertising and promotions.

The location of mandated responsible gambling controls for each gambling activity type are shown in Table 21.

Table 21: Responsible Gambling Controls in Qld

Gambling Activity	Control Location
Gaming machines	Gaming Machine Act Gaming Machine Regulation Casino Control Act Queensland Responsible Gambling Code of Practice
Table gaming	Casino Control Act Queensland Responsible Gambling Code of Practice
Keno	Casino Control Act Keno Act Queensland Responsible Gambling Code of Practice
Terrestrial wagering	Casino Control Act Wagering Act Queensland Responsible Gambling Code of Practice
Online wagering	Interactive Gambling (Player Protection) Act Queensland Responsible Gambling Code of Practice
Lotteries	Lotteries Act Lotteries Regulation Charitable and Non-Profit Gaming Act Charitable and Non-Profit Gaming Regulation Queensland Responsible Gambling Code of Practice



## Changes Since 2017

The *Queen's Wharf Brisbane Act 2016* came into effect on 27 May 2016, which will govern the conduct of table gaming in the relocated casino at the Queen's Wharf development (scheduled to be operational in late 2022).<sup>47</sup>

Harm minimisation controls for interactive gambling and wagering were also amended to prohibit gambling providers from:

- providing inducements to open, refer another person to open, or to close an interactive wagering account
- offering free bets to account holders unless they can withdraw the payout from the bet at any time
- direct marketing their services unless the person has given express or informed consent.

These measures were introduced to ensure that Qld's wagering and interactive gambling controls were consistent with the National Consumer Protection Framework for Online Wagering.<sup>48</sup>

Further detail on these changes is contained in [Appendix C](#).

## Comparison to Tasmanian Code

Table 22: Key findings – Tasmania Code compared to Qld controls

Key Findings
<ul style="list-style-type: none"> <li>• The comparison of the Tasmanian Code and the Qld controls shows that:               <ul style="list-style-type: none"> <li>– The Tasmanian Code has 25 controls that are not prescribed by Qld for any gambling activity</li> <li>– The Tasmanian Code has 6 controls that are broader than Qld – these are in relation to advertising, player loyalty programs, access to cash and clocks.</li> <li>– Qld has 3 controls that are broader than the Tasmanian Code – these are in relation to inducements and player loyalty programs</li> <li>– The Tasmanian Code has 9 controls that Qld also applies to other gambling activities – these are in relation to inducements, access to cash, payment of winnings, service of food and alcohol, clocks and information to players.</li> </ul> </li> <li>• Qld has additional controls that are either not in the Tasmanian Code or fall outside the scope of the Tasmanian Code, covering areas such as advertising, payment of winnings, staff training, community interaction and gambling premises.</li> </ul>

A comparison with Qld harm minimisation and responsible gambling controls (see Table 23) indicates that the Tasmanian Code contains significantly more controls than Qld. It also revealed that the Tasmanian Code has fewer or no controls compared to Qld in the following areas:

- There are several controls in Qld that are similar to those in the Tasmanian Code but apply to different or additional gambling activities. This occurs in:
  - inducements (2.6)

<sup>47</sup> The Treasury Casino is relocating to this new site. See [Queen's Wharf Brisbane](#) website. Accessed 23 September 2021.

<sup>48</sup> [Explanatory Speech for Criminal Code \(Consent and Mistake of Fact\) and Other Legislative Amendment Bill](#), Hon SM Fentiman, MP, 26 November 2020

- access to cash (4.6, 4.7, 4.9)
- payment of winnings (5.1, 5.2)
- service of food and alcohol (7.2)
- clocks in gambling areas (8.2)
- information to players (10.1(c)).
- Qld requires gaming machine operators to ensure that ‘...a person connected with, or who is an employee of, a [gaming machine] licensee [who] has the power to exercise a significant influence over the conduct of gaming by the licensee...’<sup>49</sup> must complete an approved responsible service of gambling course. There is no equivalent control in the Tasmanian Code.
- Unlike in the Tasmanian Code, Qld outlines requirements for all gambling operators to have early intervention and prevention strategies, customer liaisons.
- Qld has controls that are not present in the Tasmanian Code that require all advertising for gaming activities, except lotteries, to ‘...not focus exclusively on gambling, where there are other activities to promote’<sup>50</sup> and ‘...not involve any external signs advising of winnings paid.’<sup>51</sup>
- Qld has controls with no equivalent in the Tasmanian Code that outline requirements for the physical environment that relate to:
  - minimising the exposure of children to gambling and providing adjunct childcare
  - providing hospitality services to encourage customers to take breaks.
  - implementing procedures to discourage gambling customers to participate in extended, intensive and repetitive play.

Further information on these differences can be found in [Appendix D](#).

Table 23: Comparing Tasmania Code to Qld controls

Legend					
Tas Only	More	Same	Fewer	Omitted	Neither
<i>Tas has controls and other jurisdiction does not</i>	<i>Tas has more controls</i>	<i>Tas has same/similar controls</i>	<i>Tas has fewer controls</i>	<i>Tas has no controls and other jurisdiction does</i>	<i>Neither jurisdiction has controls</i>

Please refer to the Tasmanian Code in [Appendix A](#) when reviewing the heat map below.

Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>1. Advertising</b>						
1.1	Same	Same	Same	Same	Same	Same
1.2	Same	Same	Same	Same	Same	Same
1.3	Same	Same	Same	Same	Same	Same

<sup>49</sup> [Gaming Machines Act 1991](#), p 207

<sup>50</sup> [Queensland Responsible Gambling Code of Practice](#), p. 6

<sup>51</sup> *Ibid*, p. 6



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
1.4	Same	Same	Same	Same	Same	Same
1.5	Same	Same	Same	Same	Same	Same
1.6	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.7	Same	Same	Same	Same	Same	Same
1.8	Same	Same	Same	Same	Same	Same
1.9	Same	Same	Same	Same	Same	Same
1.10	More	More	More	More	More	More
1.11	Same	Same	Same	Same	Same	Same
1.12	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.13	Same	Same	Same	Same	Same	Same
1.14	Same	Same	Same	Same	Same	Same
1.15	Same	Same	Same	Same	Same	Same
1.16	Same	Same	Same	Same	Same	Same
1.17	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
1.18	Tas Only	Neither	Neither	Neither	Neither	Neither
1.19	Neither	Neither	Neither	Neither	Tas Only	Neither
1.20	Neither	Neither	Neither	Neither	Same	Neither
<b>2. Inducements</b>						
2.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
2.2	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
2.3	Fewer	Same	Same	Same	Neither	Fewer
2.4	Neither	Neither	Neither	Neither	Same	Neither
2.5	Same	Tas Only	Tas Only	Same	Neither	Same
2.6	Fewer	Same	Same	Same	Neither	Omitted
2.7	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Tas Only
2.8	Tas Only	Neither	Neither	Neither	Neither	Neither



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>3. Player loyalty programs</b>						
3.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.2	Neither	Neither	Neither	Neither	Neither	Tas Only
3.3	Same	Same	Same	Same	Same	Same
3.4	Same	Same	Same	Same	Same	Same
3.5	More	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.6	Same	Same	Same	Same	Same	Neither
3.7	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.8	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.9	Same	Same	Same	Same	Tas Only	Same
3.10	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.11	More	Tas Only	Tas Only	More	More	Tas Only
3.12	Same	Same	Same	Same	Same	Same
3.13	Fewer	Same	Same	Same	Tas Only	Fewer
3.14	Same	Same	Same	Same	Tas Only	Tas Only
<b>4. Access to cash</b>						
4.1	Same	Same	Same	Same	Neither	Neither
4.2	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.3	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.4	Same	Same	Same	Same	Neither	Neither
4.5	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.6	More	More	More	More	Neither	Omitted
4.7	More	More	More	More	Neither	Omitted
4.8	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.9	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Omitted
<b>5. Payment of winnings</b>						
5.1	Same	Omitted	Same	Omitted	Omitted	Omitted



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
5.2	Same	Neither	Same	Neither	Neither	Omitted
5.3	Tas Only	Neither	Tas Only	Neither	Neither	Neither
5.4	Tas Only	Neither	Tas Only	Neither	Neither	Neither
<b>6. Lighting</b>						
6.1	Same	Same	Neither	Neither	Neither	Neither
<b>7. Service of food and alcohol</b>						
7.1	Tas Only	Neither	Neither	Neither	Neither	Neither
7.2	Same	Omitted	Omitted	Omitted	Neither	Neither
7.3	Same	Same	Same	Same	Neither	Same
<b>8. Clocks in gambling areas</b>						
8.1	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
8.2	More	More	More	More	Omitted	Neither
<b>9. Staff training in recognising people with gambling problems</b>						
9.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
9.2	Neither	Neither	Neither	Tas Only	Tas Only	Neither
9.3	Same	Neither	Neither	Neither	Neither	Neither
9.4	Same	Same	Same	Same	Same	Same
<b>10. Information to players</b>						
10.1 (a)	Same	Same	Same	Same	Same	Same
10.1 (b)	Same	Same	Same	Same	Same	Same
10.1 (c)	Same	Same	Same	Same	Same	Omitted
10.1 (d)	Same	Same	Same	Same	Same	Same
10.2	Same	Same	Same	Same	Neither	Neither
10.3	Neither	Neither	Neither	Neither	Neither	Same
10.4	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only

## 3.6 South Australia

### Regulatory Overview

Gambling activities in SA are primarily regulated by Consumer and Business Services, a division of the SA Government's Attorney-General's Department. The exception is the Lotteries Commission of South Australia, a statutory authority that conducts lotteries for and on behalf of the SA Government.

The Office for Problem Gambling within the Department of Human Services administers the Gamblers Rehabilitation Fund. The fund is 'a joint initiative of the Australian Hotels Association (SA), Clubs SA, Adelaide Casino and the Government of South Australia'.<sup>52</sup>

SA's gambling-related legislative instruments are shown in Table 24.

Table 24: SA Gambling Legislative Instruments

Regulator	Primary Instruments	Subordinate Instruments	Codes and Guidelines
Consumer and Business Services, Attorney-General's Department	<i>Authorised Betting Operations Act 2000</i>	<i>Authorised Betting Operations Regulations 2016</i> <i>Authorised Betting Operations (Fees) Revocation Regulations 2020</i> 106 notices published by Government Gazette	Advertising Code of Practice Responsible Gambling Code of Practice Systems and procedures designed to prevent betting by children
	<i>Casino Act 1997</i>	<i>Casino Regulations 2013</i> 41 notices published by Government Gazette	Advertising Code of Practice Responsible Gambling Code of Practice Voluntary Pre-commitment Code Account Based Cashless Gaming Systems Ticket-In Ticket-Out Systems Employee Training
	<i>Gambling Administration Act 2019</i>	<i>Gambling Administration Regulations 2020</i> 4 notices published by Government Gazette	Automated Risk Monitoring Systems Facial Recognition System Provider Requirements Facial Recognition Systems - Gaming Machine Licence Facial Recognition Systems - Casino Licence
	<i>Gaming Machines Act 1992</i>	<i>Gaming Machines Regulations 2020</i> <i>Gaming Machines (Fees) Revocation Regulations 2020</i>	Advertising Code of Practice Responsible Gambling Code of Practice Gaming Machines Gambling Code of Practice

<sup>52</sup> [Gamblers Rehabilitation Fund](#) website. Accessed 16 September 2021

Regulator	Primary Instruments	Subordinate Instruments	Codes and Guidelines
		58 notices published by Government Gazette	Voluntary Pre-commitment Code Account Based Cashless Gaming Systems Ticket-In Ticket-Out Systems Employee Training
	<i>Lotteries Act 2019</i> (not commenced)		
	<i>Lottery and Gaming Act 1936</i>	<i>Lottery and Gaming Regulations 2008</i> 43 notices published by Government Gazette	
	<i>Problem Gambling Family Protection Orders Act 2004</i>	2 notices published by Government Gazette	
Lotteries Commission of South Australia	<i>State Lotteries Act 1966</i>	<i>Gambling Codes of Practice Notice 2013</i> 12 notices published by Government Gazette	Advertising Code of Practice Responsible Gambling Code of Practice

## Harm Minimisation and Responsible Gambling

Under the Gambling Administration Act, the Liquor and Gambling Commissioner is required ‘to develop and promote strategies for reducing the incidence of problem gambling and for preventing or minimising the harm caused by gambling’.<sup>53</sup>

Harm minimisation and responsible gambling processes and procedures in SA are predominately mandated through the following three codes of practice:

- Advertising Code of Practice
- Gaming Machine Gambling Code of Practice
- Responsible Gambling Code of Practice.

Both the Casino Regulations and Gaming Machine Regulations outline a Voluntary Pre-commitment Code, which requires a licensee to have a pre-commitment system that a person can volunteer to use.

Proposed codes of practice for the Adelaide Casino and Authorised Betting Operators are currently under review by the Commissioner.<sup>54</sup>

The location of mandated responsible gambling controls for each gambling activity type are shown in Table 25.

<sup>53</sup> [Gambling Administration Act 2019](#), section 6(a)

<sup>54</sup> [Gambling Codes of Practice](#) website. Accessed 20 September 2021

Table 25: Responsible Gambling Controls in SA

Gambling Activity	Control Location
Gaming machines	Gambling Administration Act Gaming Machines Act Casino Act Casino Regulations Advertising Code of Practice Gaming Machine Gambling Code of Practice Responsible Gambling Code of Practice
Table gaming	Gambling Administration Act Casino Act Casino Regulations Advertising Code of Practice Responsible Gambling Code of Practice
Keno	Gambling Administration Act Advertising Code of Practice Responsible Gambling Code of Practice
Terrestrial wagering	Gambling Administration Act Authorised Betting Operations Act Authorised Betting Operations Regulations Advertising Code of Practice Responsible Gambling Code of Practice
Online wagering	Gambling Administration Act Authorised Betting Operations Act Authorised Betting Operations Regulations Advertising Code of Practice Responsible Gambling Code of Practice
Lotteries	Gambling Administration Act Lottery and Gaming Regulations Advertising Code of Practice Responsible Gambling Code of Practice

### Changes Since 2017

The key administrative change to the SA regulatory environment was the repeal of the *Independent Gambling Authority Act 1994* by the enacting of the *Gambling Administration Act*

2019. Accordingly, the Independent Gambling Authority ceased to exist with its functions being taken over by Consumer and Business Services.<sup>55</sup>

Additionally, the Lotteries Act has been assented and will repeal the Lotteries and Gaming Act when it commences.

The primary change to how SA controls gambling harm minimisation came with the enactment of the Gaming Machine Gambling Code of Practice in December 2020. This Code contains similar controls to the Tasmanian Code but is applied solely within the context of gaming machines.

Amendments to primary and subsidiary gambling instruments have also had an impact on gambling harm minimisation processes and procedures. The most significant changes occurred for casinos and gaming machines with the inclusion of barring order mechanisms and introduction the Gaming Machines Gambling Code of Practice.

The structural changes stem from the recommendations of an administrative review of gambling regulation in SA by Tim Anderson QC (retired Supreme Court judge).<sup>56</sup> The remaining changes were implemented subsequent to the introduction of the Gambling Administration Act, and were predicated on the need to balance the economic viability of the gambling industry and community expectation of responsible gambling.<sup>57 58</sup>

Further detail on these changes is contained in [Appendix C](#).

## Comparison to Tasmanian Code

Table 26: Key findings – Tasmania Code compared to SA controls

Key Findings
<ul style="list-style-type: none"> <li>• The comparison of the Tasmanian Code and the SA controls shows that:                             <ul style="list-style-type: none"> <li>– The Tasmanian Code has 28 controls that are not prescribed by SA for any gambling activity</li> <li>– The Tasmanian Code has 2 controls that are broader than SA controls – there are in relation to player loyalty programs and service of food and alcohol</li> <li>– SA has 5 controls that are broader than the Tasmanian Code – these are in relation to advertising, inducements and access to cash</li> <li>– The Tasmanian Code has 11 controls that SA also applies to other gambling activities – these are in relation to advertising, inducements, player loyalty programs, payment of winnings, service of food and alcohol and clocks.</li> </ul> </li> <li>• SA has additional controls present that are either not in the Tasmanian Code or fall outside the scope of the Tasmanian Code, covering areas such as advertising, inducements, player loyalty programs, access to cash, community interaction and the use of gaming machines.</li> </ul>

A comparison with SA harm minimisation and responsible gambling controls (see Table 27) indicates that the Tasmanian Code contains more controls than SA. It also revealed that the Tasmanian Code has fewer or no controls compared to SA in the following areas:

<sup>55</sup> [Gambling Administration Bill 2019 Second Reading Speech](#), Hon V A Chapman, MP, South Australian House of Assembly, 13 November 2019

<sup>56</sup> [Review of Commercial Gambling Regulation in South Australia](#), T R Anderson QC, 9 December 2016

<sup>57</sup> [Striking the right balance in gaming regulation](#), South Australian Attorney-General's Department website. Accessed 4 November 2021

<sup>58</sup> [Gambling Reform Update](#), Consumer and Business Services website. Accessed 5 November 2021



- For the advertising control relating to suggesting skill can influence games of chance, the SA control goes further than the Tasmanian Code by requiring that gambling advertising must not exaggerate the extent to which skill can influence skill-based gambling – not just for games of chance.
- For the advertising control related to the sounds of gaming machines in advertisements, SA goes further by not allowing *the ‘...sounds or images of coins landing in the tray of a gaming machine, banknotes being inserted into or dispensed from a gaming machine or tickets being printed or dispensed from a gaming machine’*<sup>59</sup> in advertisements.
- There are some advertising controls that are in SA but have no equivalent in the Tasmanian Code, such as:
  - not allowing the use of ‘win’, ‘\$’ or any analogous expression in advertising, with some exceptions, for all gambling activities
  - having controls for gaming machine operators without responsible gambling agreements regarding exterior advertisements on or in the immediate environment of gaming machine venues and advertising materials inside venues.
- There are several controls in SA that are similar to those in the Tasmanian Code but apply to different or additional gambling activities. This occurs in:
  - advertising (Tasmanian Code sections 1.17, 1.20)
  - inducements (2.3, 2.4, 2.5, 2.6)
  - player loyalty programs (3.1)
  - payment of winnings (5.1, 5.3)
  - service of food and alcohol (7.2)
  - clocks in gambling areas (8.2).
- SA has stronger controls than those in the Tasmanian Code for inducements relating to lotteries, as gambling providers *‘...must not offer or provide any inducement directed at encouraging patrons to gamble and to people to open gambling accounts’*<sup>60</sup> with few exceptions.
- Unlike in the Tasmanian Code, SA outlines controls for devices that allow users to purchase, without the assistance of an operator, gambling products and process winnings for keno, terrestrial wagering and lotteries.
- SA gaming machine licensees must comply with several controls that have no equivalent in the Tasmanian code, including:
  - *‘...not [allowing] participation in a loyalty program other than one which includes a pre commitment program approved by the Authority’*<sup>61</sup>
  - not allowing audio devices on gaming machines unless the customer is hearing impaired
  - not allowing a device or mechanism to be fitted that allows multiple successive games to be played automatically
  - not allowing linked jackpots or the accumulation of winnings from any other gaming machine

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<sup>59</sup> [Gaming Machines Gambling Code of Practice](#), p 4

<sup>60</sup> [Responsible Gambling Code of Practice](#), p 40

<sup>61</sup> *Ibid*, p 56



- having to operate a pre-commitment system in accordance with a voluntary pre-commitment code
- in addition to providing patrons who display signs of gambling harm with the name and telephone number of a widely available gambling help service, the gaming machine licensee is to inform staff about the patron and ensure management level contact is established and maintained with the gambling help service about problem gambling matters.
- Casinos in SA have the additional licence conditions that impact the operation gaming machines:
  - not allowing banknotes to be inserted into a gaming machine with a credit balance of \$100 or more
  - not allowing banknotes greater than \$50 to be inserted into gaming machines.
- Casinos and gaming machine operators in SA must ensure that a condensed warning message and national gambling helpline number on ATM transaction slips.
- Gaming providers in SA must ensure that coins used at gaming machines are obtained from a cashier or an automated coin dispensing machine that they actively monitor.

Further information on these differences can be found in [Appendix D](#).

Table 27: Comparing Tasmania Code to SA controls

Legend					
Tas Only	More	Same	Fewer	Omitted	Neither
<i>Tas has controls and other jurisdiction does not</i>	<i>Tas has more controls</i>	<i>Tas has same/similar controls</i>	<i>Tas has fewer controls</i>	<i>Tas has no controls and other jurisdiction does</i>	<i>Neither jurisdiction has controls</i>

Please refer to the Tasmanian Code in [Appendix A](#) when reviewing the heat map below.

Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>1. Advertising</b>						
1.1	Same	Same	Same	Same	Same	Same
1.2	Same	Same	Same	Same	Same	Same
1.3	Same	Same	Same	Same	Same	Same
1.4	Same	Same	Same	Same	Same	Same
1.5	Same	Same	Same	Same	Same	Same
1.6	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.7	Fewer	Fewer	Fewer	Fewer	Fewer	Fewer
1.8	Same	Same	Same	Same	Same	Same
1.9	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Same



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
1.10	Same	Same	Same	Same	Same	Same
1.11	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.12	Same	Same	Same	Same	Same	Same
1.13	Same	Same	Same	Same	Same	Same
1.14	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.15	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.16	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.17	Same	Same	Same	Same	Same	Omitted
1.18	Fewer	Neither	Neither	Neither	Neither	Neither
1.19	Neither	Neither	Neither	Neither	Tas Only	Neither
1.20	Omitted	Neither	Neither	Neither	Tas Only	Neither
<b>2. Inducements</b>						
2.1	Same	Same	Same	Same	Same	Same
2.2	Same	Same	Same	Same	Same	Same
2.3	Fewer	Fewer	Fewer	Fewer	Omitted	Fewer
2.4	Omitted	Omitted	Omitted	Neither	Same	Omitted
2.5	Same	Same	Same	Same	Omitted	Same
2.6	Fewer	Fewer	Fewer	Same	Neither	Omitted
2.7	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Tas Only
2.8	Tas Only	Neither	Neither	Neither	Neither	Neither
<b>3. Player loyalty programs</b>						
3.1	Same	Same	Same	Same	Same	Omitted
3.2	Neither	Neither	Neither	Neither	Neither	Tas Only
3.3	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.4	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.5	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.6	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
3.7	Same	Same	Same	Same	Same	Same
3.8	Tas Only	Tas Only	Tas Only	Same	Same	Tas Only
3.9	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.10	More	More	More	More	More	More
3.11	Same	Same	Same	Same	Same	Same
3.12	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.13	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.14	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
<b>4. Access to cash</b>						
4.1	Same	Same	Tas Only	Same	Neither	Neither
4.2	Same	Tas Only	Tas Only	Tas Only	Neither	Neither
4.3	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.4	Same	Same	Same	Same	Neither	Neither
4.5	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.6	Same	Same	Same	Same	Neither	Neither
4.7	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.8	Fewer	Tas Only	Tas Only	Tas Only	Neither	Neither
4.9	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
<b>5. Payment of winnings</b>						
5.1	Same	Omitted	Same	Omitted	Neither	Neither
5.2	Same	Neither	Tas Only	Neither	Neither	Neither
5.3	Same	Omitted	Same	Omitted	Omitted	Omitted
5.4	Tas Only	Neither	Tas Only	Neither	Neither	Neither
<b>6. Lighting</b>						
6.1	Same	Tas Only	Neither	Neither	Neither	Neither
<b>7. Service of food and alcohol</b>						
7.1	Tas Only	Neither	Neither	Neither	Neither	Neither

Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
7.2	More	Omitted	Neither	Neither	Neither	Neither
7.3	Same	Same	Same	Same	Neither	Same
<b>8. Clocks in gambling areas</b>						
8.1	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
8.2	Same	Same	Same	Same	Omitted	Omitted
<b>9. Staff training in recognising people with gambling problems</b>						
9.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
9.2	Neither	Neither	Neither	Tas Only	Tas Only	Neither
9.3	Tas Only	Neither	Neither	Neither	Neither	Neither
9.4	Same	Same	Same	Same	Same	Same
<b>10. Information to players</b>						
10.1 (a)	Same	Same	Same	Same	Same	Same
10.1 (b)	Same	Same	Same	Same	Same	Same
10.1 (c)	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
10.1 (d)	Same	Same	Same	Same	Same	Same
10.2	Same	Same	Same	Same	Neither	Neither
10.3	Neither	Neither	Neither	Neither	Neither	Same
10.4	Same	Same	Same	Same	Same	Same

## 3.7 Victoria

### Regulatory Overview

The Victorian Commission for Gambling and Liquor Regulation (VCGLR) is an independent statutory authority that regulates gambling in Victoria (VIC). VCGLR also publishes specific directions and guidelines.<sup>62</sup>

The Minister for Gaming and Liquor Regulation has the authority to issue Ministerial Directions that apply to the specified gambling operators and gambling activities. These Directions can be found in the Government Gazettes and on the VCGLR website.<sup>63</sup>

<sup>62</sup> [Victorian Commission for Gambling and Liquor Regulation](#) website. Access 21 September 2021

<sup>63</sup> [Victorian Commission for Gambling and Liquor Regulation](#) website. Accessed 13 September 2021



The Victorian Responsible Gambling Foundation is a statutory authority that aims to ‘*improve the health and wellbeing of Victorians by working with our communities and government to deliver effective, evidence-based initiatives and innovative approaches to prevent gambling harm and provide support for those seeking help.*’<sup>64</sup>

VIC’s gambling-related legislative instruments are shown in Table 28.

Table 28: VIC Gambling Legislative Instruments

Regulator	Primary Instruments	Subordinate Instruments	Codes and Guidelines
Victorian Commission for Gambling and Liquor Regulation	<i>Casino (Management Agreement) Act 1993</i>		
	<i>Casino Control Act 1991</i>	<i>Casino Control (Fees) Regulations 2015</i>	
	<i>Gambling Regulation Act 2003</i>	<i>Gambling Regulations 2015</i> <i>Gambling Regulation (Pre-commitment and Loyalty Scheme) Regulations 2014</i> Ministerial Directions	Responsible Gambling Codes of Conduct Responsible Gambling Codes for Venue Operators VCLGR directions and guidelines
	<i>Victorian Commission for Gambling and Liquor Regulation Act 2011</i>		
Victorian Responsible Gambling Foundation	<i>Victorian Responsible Gambling Foundation Act 2011</i>		

The purpose of the current Ministerial Directions is outlined in Table 29.

Table 29: Current Gambling Ministerial Directions

Primary Instrument	Date Published	Summary of Purpose
Casino Control Act	19 September 2002	Sets a betting limit of \$10 for gaming machines
Casino Control Act Gambling Regulation Act	26 November 2015	Sets conditions on gaming machines allowed in specified areas in the Melbourne Casino
Gambling Regulation Act	4 April 2011	Outlines matters to be considered when determining whether to grant an approval to provide an ATM in a gaming venue
Gambling Regulation Act	14 March 2012	Bans moneyless gaming machines for a period of 10 years
Gambling Regulation Act	15 August 2012	Sets maximum permissible gaming machine entitlements

<sup>64</sup> [Victorian Responsible Gambling Foundation](#) website. Accessed 13 September 2021

Primary Instrument	Date Published	Summary of Purpose
Gambling Regulation Act	3 December 2012	Bans use of earphones and headsets for a period of 10 years
Gambling Regulation Act	1 April 2014	Arrangements for the regulation of the VIC gaming industry to reflect the commencement of the state-wide pre-commitment scheme
Gambling Regulation Act	29 October 2015	Sets gaming machine requirements
Gambling Regulation Act	17 September 2018	Sets standards and requirements that must be met by a self-exclusion program conducted by or at the request of a venue operator
Gambling Regulation Act	17 September 2018	Sets standards and requirements that a Responsible Gambling Code of Conduct (code) must meet and the content that must be included in a code
Gambling Regulation Act	21 February 2020	Sets content that must be included in a Responsible Gambling Code of Conduct (code) implemented by a venue operator
Gambling Regulation Act	26 May 2020	Sets interactive wagering and betting service requirements

## Harm Minimisation and Responsible Gambling

Regulatory controls relating to harm minimisation and responsible gambling in VIC are spread throughout Acts, Regulations, Ministerial Directions and guidelines.

Under section 3.4.12B of the Gambling Regulation Act, it is compulsory that a responsible gambling code of conduct be created and implemented by:

- a venue operator
- a wagering operator
- the public lottery licensee
- the keno licensee
- the wagering and betting licensee
- a commercial raffle organiser
- a bingo centre operator
- the casino operator
- the holder of an interactive gaming licence and
- a registered bookmaker.<sup>65</sup>

A code of conduct implemented by any of the above (except for a venue operator) must comply with the minimum standards and requirements set out in the Ministerial Direction – Responsible Gambling Codes of Conduct.

<sup>65</sup> [Victorian Commission for Gambling and Liquor Regulation](#) website. Accessed 13 September 2021



A code of conduct implemented by a venue operator must comply with the minimum standards and requirements set out in the Ministerial Direction – Responsible Gambling Codes for Venue Operators.

The VCGLR publish a list of model codes that comply with the Ministerial Direction and that can be adopted by a gambling operator.<sup>66</sup> Alternatively, a gambling operator can create their own code.

The location of mandated responsible gambling controls for each gambling activity type are shown in Table 30.

Table 30: Responsible Gambling Controls in VIC

Gambling Activity	Control Location
Gaming machines	Casino Control Act Gambling Regulation Act Gambling Regulations Gambling Regulation (Pre-commitment and Loyalty Scheme) Regulations Ministerial Direction – Responsible Gambling Codes of Conduct Ministerial Direction – Responsible Gambling Codes for Venue Operators
Table gaming	Casino Control Act Gambling Regulation Act Ministerial Direction – Responsible Gambling Codes of Conduct
Keno	Gambling Regulation Act Ministerial Direction – Responsible Gambling Codes of Conduct
Terrestrial wagering	Gambling Regulation Act Ministerial Direction – 26 May 2020 Ministerial Direction – Responsible Gambling Codes of Conduct
Online wagering	Gambling Regulation Act Ministerial Direction – 26 May 2020 Ministerial Direction – Responsible Gambling Codes of Conduct
Lotteries	Gambling Regulation Act Ministerial Direction – Responsible Gambling Codes of Conduct Trade Promotion Lotteries - Guideline

## Changes Since 2017

The Gambling Regulation Act has been amended to change both administrative and gambling harm minimisation processes, for example:

- increasing the efficiency and flexibility of the keno licencing process<sup>67</sup>

<sup>66</sup> [Victorian Commission for Gambling and Liquor Regulation](#) website. Accessed 21 September 2021

<sup>67</sup> [2nd Reading Speech for the Liquor and Gambling Legislation Amendment Bill 2018](#), Hon Marlene Kairouz, MLA, 28 March 2018



- requiring wagering service providers to comply with relevant harm minimisation directions issued by the Minister<sup>68</sup>
- responsible gambling codes of conduct and self-exclusion programs no longer have to be approved by the VCGLR or be submitted for an annual review
- restrictions have been imposed on where advertising by wagering service providers can be published
- Increased restrictions have been imposed on cashless gaming and access to cash in venues
- Payment of gaming machine winnings over \$2000 to be via cheque or electronic funds transfer (EFT).<sup>69</sup>

These changes were made for several reasons including:

- streamlining the gambling harm minimisation framework for wagering service providers<sup>70</sup>
- requiring relevant gambling industry participants to comply with directions and regulations made about Responsible Gambling Codes of Conduct instead of the VCGLR needing to approve or review relevant codes of conduct and self-exclusion programs<sup>71</sup>
- to enable the implementation of the National Consumer Protection Framework for online wagering<sup>72</sup>
- minimising the impact of static betting advertising on the public and children<sup>73</sup>
- minimising harm to gambling patrons by restricting certain cash transactions.<sup>74</sup>

Additionally, new Ministerial Directions were made that updated the Responsible Gambling Codes of Conduct and imposed a new Responsible Gambling Codes for Venue Operators. These changes were made to update the self-exclusion program responsible gambling requirements for venue operators.<sup>75 76</sup>

Further detail on these changes is contained in [Appendix C](#).

## Comparison to Tasmanian Code

Table 31: Key findings – Tasmania Code compared to VIC controls

### Key Findings

- The comparison of the Tasmanian Code and the VIC controls shows that:
  - The Tasmanian Code has 32 controls that are not prescribed by VIC for any gambling activity

<sup>68</sup> [Liquor and Gambling Legislation Amendment Bill 2018 Explanatory Statement](#), p 23

<sup>69</sup> [Victorian Commission for Gambling and Liquor Regulation](#) website. Accessed 21 September 2021.

<sup>70</sup> [Liquor and Gambling Legislation Amendment Bill 2018 Explanatory Statement](#), p 23

<sup>71</sup> Ibid, p 23

<sup>72</sup> [2nd Reading Speech for the Liquor and Gambling Legislation Amendment Bill 2018](#), Hon Marlene Kairouz MLA, 28 March 2018

<sup>73</sup> [Gambling Legislation Amendment Bill 2017 Explanatory Memorandum](#), p 11-13

<sup>74</sup> [Gambling Regulation Amendment \(Gaming Machine Arrangements\) Bill 2017](#), p 35-43

<sup>75</sup> [Ministerial Direction Pursuant to Section 10.6.1](#), p 1-3V

<sup>76</sup> [Ministerial Direction Pursuant to Section 10.6.6](#)

- The Tasmanian Code has 9 controls that are broader than the VIC controls – there are in relation to advertising, player loyalty programs, access to cash, payment of winnings and clocks
- VIC has 4 controls that are broader than the Tasmanian Code – these are in relation to inducements, player loyalty and access to cash
- The Tasmanian Code has 6 controls that VIC also applies to other gambling activities – these are in relation to payment of winnings, lighting, service of food and alcohol, clocks and information to players.
- VIC has additional controls that are either not in the Tasmanian Code or fall outside the scope of the Tasmanian Code, covering areas such as advertising, inducements, access to cash, lighting and community interaction.

A comparison with VIC harm minimisation and responsible gambling controls (see Table 32) indicates that the Tasmanian Code contains significantly more controls. It also revealed that the Tasmanian Code has fewer or no controls compared to VIC in the following areas:

- VIC places significant controls on venues with gaming machines. These controls include:
  - Venues cannot use non-cash gaming tokens as an inducement for players to gamble on gaming machines, nor can players have winnings or accumulated credits paid out as non-cash gaming tokens
  - Venues cannot provide a cash advance from a credit account to obtain a non-cash gaming token
  - Players sitting at gaming machines cannot be given or offered non-cash gaming tokens
  - Inducing a person to withdraw money or leave the venue to access money
  - If a venue is replacing a window, they must replace it with a window of equal or greater size.
- A loyalty scheme provider in VIC must provide both gaming and non-gaming points equally. The Tasmanian Code does not make this stipulation.
- ATMs are not allowed to operate within a casino or within 50 metres walking distance from the entrance to the casino.
- Wagering service providers cannot display gambling advertising on public transport infrastructure (e.g. bus shelters), within 150 metres of a school or near a public road or reserve.
- Gambling providers must discourage customers from engaging in extended or intensive gambling.
- There are several controls in VIC that are similar to those in the Tasmanian Code but apply to different or additional gambling activities. This occurs in:
  - payment of winnings (5.1, 5.2)
  - lighting (6.1)
  - service of food and alcohol (7.3)
  - clocks in gambling areas (8.2)
  - information to players (10.2).

Further information on these differences can be found in [Appendix D](#).

Table 32: Comparing Tasmania Code to VIC controls

Legend					
Tas Only	More	Same	Fewer	Omitted	Neither
<i>Tas has controls and other jurisdiction does not</i>	<i>Tas has more controls</i>	<i>Tas has same/similar controls</i>	<i>Tas has fewer controls</i>	<i>Tas has no controls and other jurisdiction does</i>	<i>Neither jurisdiction has controls</i>

Please refer to the Tasmanian Code in [Appendix A](#) when reviewing the heat map below.

Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>1. Advertising</b>						
1.1	Same	Same	Same	Same	Same	Same
1.2	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.3	Same	Same	Same	Same	Same	Same
1.4	Same	Same	Same	Same	Same	Same
1.5	Same	Same	Same	Same	Same	Same
1.6	More	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.7	Same	Tas Only	Tas Only	Tas Only	Tas Only	Same
1.8	Same	Same	Same	Same	Same	Same
1.9	Tas Only	Tas Only	Tas Only	Same	Same	Same
1.10	Tas Only	Tas Only	Tas Only	More	More	Tas Only
1.11	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.12	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.13	Tas Only	Tas Only	Tas Only	Same	Same	Tas Only
1.14	Same	Same	Same	Same	Same	Tas Only
1.15	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.16	Same	Same	Same	Same	Same	Same
1.17	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
1.18	Tas Only	Neither	Neither	Neither	Neither	Neither
1.19	Neither	Neither	Neither	Neither	Tas Only	Neither
1.20	Neither	Neither	Neither	Neither	Same	Neither



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>2. Inducements</b>						
2.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
2.2	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
2.3	Fewer	Tas Only	Tas Only	Tas Only	Neither	Tas Only
2.4	Neither	Neither	Neither	Neither	Same	Neither
2.5	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Tas Only
2.6	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
2.7	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Tas Only
2.8	Tas Only	Neither	Neither	Neither	Neither	Neither
<b>3. Player loyalty programs</b>						
3.1	More	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.2	Neither	Neither	Neither	Neither	Neither	Tas Only
3.3	Same	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.4	Same	Same	Same	Same	Same	Same
3.5	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.6	Same	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.7	More	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.8	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.9	Same	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.10	Fewer	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.11	Same	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.12	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.13	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.14	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
<b>4. Access to cash</b>						
4.1	More	Fewer	Fewer	Fewer	Neither	Neither
4.2	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
4.3	Fewer	Same	Same	Same	Neither	Neither
4.4	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.5	More	Same	Same	Same	Neither	Neither
4.6	Same	Tas Only	Tas Only	Tas Only	Neither	Neither
4.7	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.8	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.9	Same	Tas Only	Tas Only	Tas Only	Neither	Neither
<b>5. Payment of winnings</b>						
5.1	More	Neither	Tas Only	Neither	Neither	Omitted
5.2	More	Neither	Tas Only	Neither	Neither	Omitted
5.3	Tas Only	Neither	Tas Only	Neither	Neither	Neither
5.4	Tas Only	Neither	Tas Only	Neither	Neither	Neither
<b>6. Lighting</b>						
6.1	Same	Same	Omitted	Omitted	Neither	Neither
<b>7. Service of food and alcohol</b>						
7.1	Tas Only	Neither	Neither	Neither	Neither	Neither
7.2	Tas Only	Neither	Neither	Neither	Neither	Neither
7.3	Same	Same	Same	Same	Omitted	Tas Only
<b>8. Clocks in gambling areas</b>						
8.1	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
8.2	More	More	More	More	Omitted	Omitted
<b>9. Staff training in recognising people with gambling problems</b>						
9.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
9.2	Neither	Neither	Neither	Tas Only	Tas Only	Neither
9.3	Same	Neither	Neither	Neither	Neither	Neither
9.4	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only

Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>10. Information to players</b>						
10.1 (a)	Same	Same	Same	Same	Same	Same
10.1 (b)	Same	Same	Same	Same	Same	Same
10.1 (c)	Same	Same	Same	Same	Same	Neither
10.1 (d)	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
10.2	Same	Same	Same	Same	Omitted	Neither
10.3	Neither	Neither	Neither	Neither	Neither	Same
10.4	Tas Only	Tas Only	Tas Only	Same	Same	Tas Only

## 3.8 Western Australia

### Regulatory Overview

The administration of gambling regulation in Western Australia (WA) is split between:

- the Gaming and Wagering Commission of Western Australia, which is responsible for administering the law relating to gaming and wagering<sup>77</sup>
- the Department of Local Government, Sport and Cultural Industries, through its Racing, Gaming and Liquor portfolio, which is responsible for the regulation of community gaming, casino gaming and racing<sup>78</sup>
- the Lotteries Commission (which trades as LotteryWest), which conducts lotteries
- Racing and Wagering Western Australia (RWWA), which is a non-government organisation created under the *Racing and Wagering Western Australia Act 2003* that has responsibility 'to ensure that on-course wagering by bookmakers and racing club totalisators is conducted in accordance with the *Betting Control Act 1954* and the rules of wagering.'<sup>79</sup>

The Gaming and Wagering Commission of Western Australia also publishes guidelines and policies that aim to 'assist organisations who wish to conduct community gaming and the gaming/wagering industry to meet their regulatory obligations'.<sup>80</sup>

WA's gambling-related legislative instruments are listed in Table 33.

<sup>77</sup> [Department of Local Government, Sport and Cultural Industries](#) website. Accessed 13 September 2021

<sup>78</sup> [Department of Local Government, Sport and Cultural Industries](#) website. Accessed 20 September 2021

<sup>79</sup> [Racing and Wagering Western Australia Act 2003](#), Section 50

<sup>80</sup> [Department of Local Government, Sport and Cultural Industries](#) website. Accessed 30 September 2021

Table 33: WA Gambling Legislative Instruments

Regulator	Primary Instruments	Subordinate Instruments	Guidelines and Policies
Department of Finance	<i>Betting Tax Assessment Act 2018</i>		
Department of Local Government, Sport and Cultural Industries	<i>Gaming and Betting (Contracts and Securities) Act 1985</i>		
	<i>Racing and Wagering Western Australia Act 2003</i>	<i>Racing and Wagering Western Australia Regulations 2003</i> <i>Rules of Wagering</i>	Match-fixing in sport policy Probity assessments policy
	<i>Racing Bets Levy Act 2009</i>	<i>Racing Bets Levy Regulations 2009</i>	WA race fields policy
	<i>Racing Restriction Act 2003</i>		
Gaming and Wagering Commission of Western Australia	<i>Betting Control Act 1954</i>	<i>Betting Control Regulations 1978</i> <i>Rules of Betting</i>	Match-fixing in sport policy Probity assessments policy WA race fields policy
	<i>Casino (Burswood Island) Agreement Act 1985</i>		Casino gaming on cruise ships policy Probity assessments policy
	<i>Casino Control Act 1984</i>	<i>Casino Control Regulations 1999</i> <i>Casino Control (Burswood Island) (Licensing of Employees) Regulations 1985</i>	Electronic gaming machines – return to player (RTP) policy Licensing of security officers at Crown Perth (casino operator) policy
	<i>Gaming and Wagering Commission (Continuing Lotteries Levy) Act 2000</i>	<i>Gaming and Wagering Commission (Continuing Lotteries Levy) Regulations 2000</i>	
	<i>Gaming and Wagering Commission Act 1987</i>	<i>Gaming and Wagering Commission Regulations 1988</i>	Casino gaming on cruise ships policy Community poker policy EFTPOS/contactless payments and ATMs at Crown Perth policy Electronic gaming machines – return to player (RTP) policy Electronic gaming machines policy



Regulator	Primary Instruments	Subordinate Instruments	Guidelines and Policies
			Gambling advertising and inducements guidelines Match-fixing in sport policy Probity assessments policy Standard lottery policy Two-up policy Video lottery terminals policy
	<i>TAB (Disposal) Act 2019</i>		
Lotteries Commission	<i>Lotteries Commission Act 1990</i>	<i>Lotteries Commission (Authorised Lotteries) Rules 2016</i> <i>Lotteries Commission (Policy Instruments) Regulations 2010</i> <i>Lotteries Commission (Designated Authorities) Regulations 1998</i> <i>Lotteries Commission (Instant Lottery) Rules 1996</i> <i>Lotteries Commission Regulations 1991</i>	

### Harm Minimisation and Responsible Gambling

Regulatory controls relating to harm minimisation and responsible gambling in WA can be found in the Gaming and Wagering Commission Regulations and the Betting Control Regulations. In contrast to the Tasmanian Code, there is a much smaller set of controls in place in WA.

RWWA has developed a Responsible Wagering Code of Practice (RWWA Code) that is RWWA’s self-regulatory commitment to best practice for the provision of responsible wagering. RWWA recommends that the broader racing industry adopt the RWWA Code but cannot mandate it.

The RWWA Code is entirely voluntary as RWWA is not required to develop such a code under its establishing legislation. The RWWA Code addresses similar areas as are covered by the Tasmanian Code however is restricted to controlling wagering.

The Crown Perth Casino has its own Crown Perth Responsible Gambling Code of Conduct (Crown Perth Code). The Crown Perth Code is voluntary, as there is no requirement for the Casino to establish a responsible code of practice under its establishing legislation. The Crown Perth Code was developed with input and support from the Gaming and Wagering Commission of Western Australia and the now Department of Local Government, Sport and Cultural Industries. The Crown Perth Code contains some similar controls to those in the Tasmanian Code; however, it is restricted to controlling gambling in a casino environment.

It should be noted that keno and electronic gaming machines are not located in pubs and clubs in WA. Both types of gambling may only be played in the Crown Perth Casino.

The location of mandated responsible gambling controls for each gambling activity type are shown in Table 34.



Table 34: Responsible Gambling Controls in WA

Gambling Activity	Control Location
Gaming machines	Gaming and Wagering Commission Regulations EFTPOS/Contactless Payments and ATMs at Crown Perth Policy Crown Perth Responsible Gaming Code of Conduct (voluntary)
Table gaming	Gaming and Wagering Commission Regulations EFTPOS/Contactless Payments and ATMs at Crown Perth Policy Crown Perth Responsible Gaming Code of Conduct (voluntary)
Keno	Gaming and Wagering Commission Regulations
Terrestrial wagering	Betting Control Regulations Responsible Wagering Code of Practice (voluntary)
Online wagering	Betting Control Regulations Responsible Wagering Code of Practice (voluntary)
Lotteries	Gaming and Wagering Commission Regulations

## Changes Since 2017

The changes in gambling regulation in WA since 2017 have primarily been administrative:

- The Department of Racing, Gaming and Liquor is now a part of the Department of Local Government, Sport and Cultural Industries.
- The *Betting Tax Act 2018* introduced a ‘...new point-of-consumption betting tax from 1 January 2019 to replace the existing wagering tax arrangements...’<sup>81</sup> This was designed to make the betting tax arrangements consistent between the TAB and online and overseas betting operators.<sup>82</sup>
- The *Betting Tax Assessment Act 2018* supports the introduction of the Betting Tax Act by repealing the *Bookmakers Betting Levy Act 1954* and *Racing and Wagering Western Australia Tax Act 2003* and establishing the supporting administrative provisions for the assessment and payment of the new betting tax.<sup>83</sup>
- The *TAB (Disposal) Act 2019* came into effect in September 2019 to enable the ‘disposal of the whole or part of any business carried on by, or all or any of the assets or liabilities owned by, Racing and Wagering Western Australia trading as TAB or TAB Touch.’<sup>84</sup> This Act was introduced following an extensive consultation process by the WA Government to develop a TAB sale framework. The Act.<sup>85</sup>
  - allows for the disposal of the whole or part of the TAB

<sup>81</sup> [2<sup>nd</sup> Reading Speech for Betting Tax Bill 2018](#), Hon Ben Wyatt, MLA, Hansard, 10 October 2018

<sup>82</sup> Ibid

<sup>83</sup> [2<sup>nd</sup> Reading Speech for Betting Tax Assessment Bill 2018](#), Hon Ben Wyatt, MLA, Hansard, 10 October 2018

<sup>84</sup> [TAB \(Disposal\) Act 2019](#), p. 1

<sup>85</sup> [2<sup>nd</sup> Reading Speech for TAB \(Disposal\) Bill 2019](#), Hon Ben Wyatt, MLA, Hansard, 15 May 2019



- amends the *Betting Control Act 1954* to introduce a new wagering licence regime that will come into effect when the TAB is sold
- allows the introduction of simulated racing products at TAB outlets.
- It is noted that the TAB sale process was previously suspended due to uncertainty caused by COVID-19, but the WA Government announced in October 2021 that the process will recommence.<sup>86</sup>

There have been several minor amendments to legislated gambling harm minimisation controls including tightening and clarifying restrictions on gambling advertising and prohibiting the placement of remote gambling devices<sup>87</sup> on public premises with the primary motivation behind these changes being to reduce harm to vulnerable and young people.<sup>88</sup>

Further detail on these changes is contained in [Appendix C](#).

## Comparison to Tasmanian Code

Table 35: Key findings – Tasmania Code compared to WA controls

Key Findings
<ul style="list-style-type: none"> <li>• The comparison of the Tasmanian Code and the WA controls shows that:                             <ul style="list-style-type: none"> <li>- The Tasmanian Code has 36 controls that are not prescribed by WA for any gambling activity</li> <li>- The Tasmanian Code has 6 controls that are broader than the WA controls – these are in relation to advertising, access to cash and payment of winnings</li> <li>- WA has 3 controls that are broader than the Tasmanian Code – these are in relation to advertising and inducements</li> <li>- The Tasmanian Code has 6 controls that WA also applies to other gambling activities – these are in relation to inducements, payment of winnings, lighting and service of food and alcohol.</li> </ul> </li> <li>• WA has an additional control that is either not in the Tasmanian Code or falls outside the scope of the Tasmanian Code, covering breaks from play.</li> </ul>

A comparison with the WA harm minimisation and responsible gambling controls (see Table 36) indicates that the Tasmanian Code contains significantly more controls than Western Australia. It also revealed that the Tasmanian Code has fewer or no controls compared to Western Australia in the following areas:

- As part of controlling gambling advertising, WA has a terrestrial and online wagering requirement to avoid '*cooperative advertising with companies whose predominant products are children's products / activities*'<sup>89</sup>, which is more specific than not targeting people under 18 years of age to gamble.

<sup>86</sup> [Racing and Wagering Western Australia website](#). Accessed 9 October 2021

<sup>87</sup> The [Gaming and Wagering Commission Act 1987](#) defines a remote gambling device as a telecommunications device that is primarily or exclusively built to enable gambling on an event or contingency

<sup>88</sup> [2<sup>nd</sup> Reading Speech for Gaming and Wagering Legislation Amendment Bill 2018](#), Hon Paul Papalia, MLA, Hansard, 18 September 2018

<sup>89</sup> [Responsible Wagering Code of Practice](#), p.12

- Casinos also cannot ‘portray people in a way that discriminates against a person or section of the community on the basis of their race, ethnicity, nationality, sex, age, sexual preference, religion, disability or political belief’<sup>90</sup>, which goes beyond Tasmania’s control of not targeting vulnerable or disadvantaged groups.
- There are a few controls in WA that are similar to those in the Tasmanian Code but apply to different or additional gambling activities. This occurs in:
  - inducements (Tasmanian Code sections 2.3, 2.4, 2.5)
  - payment of winnings (5.2)
  - lighting (6.1)
  - service of food and alcohol (7.3).
- Crown Perth can judge whether players have taken sufficient breaks in play and, if not, ask them to leave the casino and not return for 24 hours.

Further information on these differences can be found in [Appendix D](#).

Table 36: Comparing Tasmania Code to WA controls

Legend					
Tas Only	More	Same	Fewer	Omitted	Neither
<i>Tas has controls and other jurisdiction does not</i>	<i>Tas has more controls</i>	<i>Tas has same/similar controls</i>	<i>Tas has fewer controls</i>	<i>Tas has no controls and other jurisdiction does</i>	<i>Neither jurisdiction has controls</i>

Please refer to the Tasmanian Code in [Appendix A](#) when reviewing the heat map below.

Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>1. Advertising</b>						
1.1	Same	Same	Same	Same	Same	Same
1.2	Tas Only	Tas Only	Tas Only	Same	Same	Tas Only
1.3	Same	Same	Same	Same	Same	Tas Only
1.4	Same	Same	Same	Same	Same	Same
1.5	Same	Same	Same	Same	Same	Tas Only
1.6	Same	Same	Same	Tas Only	Tas Only	Same
1.7	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.8	More	More	More	Same	Same	Tas Only
1.9	Same	Same	Same	Same	Fewer	Same
1.10	More	More	More	Tas Only	Tas Only	Tas Only

<sup>90</sup> [Crown Perth Responsible Gaming Code of Conduct](#), p.23



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
1.11	Fewer	Fewer	Fewer	Tas Only	Tas Only	Tas Only
1.12	Same	Same	Same	Tas Only	Tas Only	Same
1.13	Same	Same	Same	More	More	Same
1.14	Same	Same	Same	Tas Only	Tas Only	Tas Only
1.15	Tas Only	Tas Only	Tas Only	Same	Same	Tas Only
1.16	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
1.17	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
1.18	Tas Only	Neither	Neither	Neither	Neither	Neither
1.19	Neither	Neither	Neither	Neither	Tas Only	Neither
1.20	Neither	Neither	Neither	Neither	Tas Only	Neither
<b>2. Inducements</b>						
2.1	Same	Same	Same	Tas Only	Tas Only	Same
2.2	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
2.3	Tas Only	Tas Only	Tas Only	Fewer	Omitted	Tas Only
2.4	Tas Only	Tas Only	Tas Only	Omitted	Tas Only	Tas Only
2.5	Same	Same	Same	Same	Omitted	Same
2.6	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
2.7	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Tas Only
2.8	Tas Only	Neither	Neither	Neither	Neither	Neither
<b>3. Player loyalty programs</b>						
3.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.2	Neither	Neither	Neither	Neither	Neither	Tas Only
3.3	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.4	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.5	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.6	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
3.7	Same	Same	Same	Tas Only	Tas Only	Tas Only



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
3.8	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.9	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.10	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.11	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.12	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.13	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
3.14	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only
<b>4. Access to cash</b>						
4.1	Same	Same	Same	Same	Neither	Neither
4.2	Same	Same	Same	Tas Only	Neither	Neither
4.3	Tas Only	Tas Only	Tas Only	Same	Neither	Neither
4.4	Same	Same	Same	Same	Neither	Neither
4.5	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.6	More	More	More	More	Neither	Neither
4.7	More	More	More	Tas Only	Neither	Neither
4.8	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
4.9	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
<b>5. Payment of winnings</b>						
5.1	Tas Only	Neither	Tas Only	Neither	Neither	Neither
5.2	More	Omitted	More	Neither	Neither	Neither
5.3	Tas Only	Neither	Tas Only	Neither	Neither	Neither
5.4	Tas Only	Neither	Tas Only	Neither	Neither	Neither
<b>6. Lighting</b>						
6.1	Same	Same	Omitted	Neither	Neither	Neither
<b>7. Service of food and alcohol</b>						
7.1	Tas Only	Neither	Neither	Neither	Neither	Neither
7.2	Tas Only	Neither	Neither	Neither	Neither	Neither



Tasmanian Code	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
7.3	Same	Same	Same	Same	Omitted	Tas Only
<b>8. Clocks in gambling areas</b>						
8.1	Tas Only	Tas Only	Tas Only	Tas Only	Neither	Neither
8.2	Same	Same	Same	Tas Only	Neither	Neither
<b>9. Staff training in recognising people with gambling problems</b>						
9.1	Tas Only	Tas Only	Tas Only	Tas Only	Tas Only	Neither
9.2	Neither	Neither	Neither	Tas Only	Tas Only	Neither
9.3	Tas Only	Neither	Neither	Neither	Neither	Neither
9.4	Same	Same	Same	Same	Same	Tas Only
<b>10. Information to players</b>						
10.1 (a)	Same	Same	Same	Same	Same	Tas Only
10.1 (b)	Same	Same	Same	Same	Same	Tas Only
10.1 (c)	Same	Same	Same	Same	Same	Neither
10.1 (d)	Same	Same	Same	Tas Only	Tas Only	Tas Only
10.2	Same	Same	Same	Same	Neither	Neither
10.3	Neither	Neither	Neither	Neither	Neither	Tas Only
10.4	Tas Only	Tas Only	Tas Only	Same	Same	Tas Only



## 4 Gambling Exclusion Schemes

The Tasmanian Gambling Exclusion Scheme (TGES) has been established under the Gaming Control Act. The TGES is a separate harm minimisation and responsible gambling control that is separate from the Tasmanian Code.

Under the TGES, persons can be excluded from gambling in all licensed gambling venues in the State and from gambling through Tasmania licensed online gambling operators. The operation of the TGES is supported by an online database. The key features of the TGES are detailed in Table 37.

Table 37: Tasmanian Gambling Exclusion Scheme exclusion methods<sup>91</sup>

Method	Description
Self-Exclusion	This is where a person experiencing gambling problems excludes themselves from gambling. This is organised through a counsellor who, in addition to assisting with the self-exclusion process, can help the person with their gambling problem. This type of exclusion is for a minimum period of 6 months and remains for a maximum three years unless revoked through a counsellor.
Venue Operator Exclusion	This is where the licensee of a venue or their staff excludes a person where they believe that the person's behaviour is affecting their own welfare or the welfare of others. The venue operator has significant power to exclude a person where they consider that it is appropriate and where the reason is gambling related. This type of exclusion remains for a maximum period of three years unless revoked by the venue operator (or revoked by the Commission on appeal within 28 days of receiving the exclusion order).
Third Party Exclusion	This is where a person with a close personal interest in the welfare of another person, applies to the Tasmanian Liquor and Gaming Commission for that person to be excluded from gambling (including internet-based gambling). This type of exclusion remains for a maximum period of three years unless the order is revoked by the Commission.
Self-Exclusion from Internet-Based Gambling	This is where a person experiencing gambling problems through an internet-based gambling site, excludes themselves online. This can be undertaken by following the prompts available on the site or by speaking with helpline staff. Links to problem gambling organisations are also accessible online. This type of exclusion is for a minimum period of 6 months and remains until revoked by the excluded person.
Exclusion ordered by the Commissioner of Police <sup>92</sup>	The Commissioner of Police may order a person to be excluded from gambling premises. This type of exclusion remains for a maximum period of three years unless revoked by the Magistrates Court (Administrative Appeals Division) after review within 28 days of receiving the exclusion order.

All other jurisdictions have exclusion methods, although the arrangements in Western Australia have been voluntarily established by gambling operators, not mandated by law.

<sup>91</sup> [Liquor and Gaming](#) website. Accessed 2 November 2021

<sup>92</sup> Section 112G of the [Gaming Control Act](#) states: 'Where the Commissioner of Police is of the opinion that, in order to suppress crime or disorderly conduct, it is necessary or desirable to exclude a person from premises on which wagering with, or other participation in a game or gaming activity conducted by, a specified licence holder occurs, the Commissioner may direct the licence holder to exclude the person from those premises by giving the person or causing the person to be given an exclusion order ...'

Since 2017, there have been some changes to how other States and Territories approach exclusion schemes:

- In VIC, self-exclusion programs no longer have to be approved by the VCGLR or be submitted for an annual review.
- In SA, barring orders were linked to directly to the gaming machines through the Gaming Machines Gambling Code of Practice.

A comparison of the TGES with the arrangements in other jurisdictions is shown in Table 38. It shows that all jurisdictions have a self-exclusion method and most jurisdictions allow venue operators and the Commissioner of Police to exclude people. However, self-exclusion from internet-based gambling is only available in the NT and third party exclusions are only available in WA and SA.

Further information on these other jurisdictions exclusion schemes can be found in [Appendix E](#).

Table 38: Comparing Jurisdictional Gambling Exclusion Schemes to Tasmania’s Scheme

TAS	NSW	VIC	Qld	WA	SA	ACT	NT
Self-Exclusion	Yes						
Self-Exclusion from Internet-Based Gambling							Yes
Venue Operator Exclusion		Yes	Yes		Yes	Yes	Yes
Third Party Exclusion				Yes	Yes		
Exclusion ordered by the Commissioner of Police	Yes	Yes	Yes		Yes	Yes	



## 5 Future Gaming Market Reforms

The Tasmanian Government introduced the *Gaming Control Amendment (Future Gaming Market) Bill 2021* in October 2021 to implement its Future Gaming Market election policy. The reforms are proposed to take effect from 1 July 2023 and include:

- a decrease in the state wide EGM cap by 150 machines
- individual venue licences to operate EGMs
- a new Keno operator licence
- two new high roller non-resident casino licences
- more appropriate distribution of returns from gaming
- establishing a separate Licensed Monitoring Operator to monitor the hotel and club EGM network
- introduction of fully automated table gaming arrangements
- removing the monopoly on the simulated racing event ‘Trackside’
- an increase in the Community Support Levy (CSL) to improve harm minimisation.

The Minister for Finance, when introducing the legislation, announced that he would direct the Tasmanian Liquor and Gaming Commission<sup>93</sup> to investigate the introduction of two new harm reduction measures in Tasmanian casinos, hotels and clubs:

- the use of facial recognition technology to support the Tasmanian Gambling Exclusion Scheme by enabling the better identification of excluded players
- the introduction of card-based gaming, complemented by pre-commitment models, that would enable players to set limits on their EGM gaming time and expenditure.

The Tasmanian Government’s Future Gaming Market Reforms are outlined in more detail in [Appendix F](#).

An analysis<sup>94</sup> of the reforms indicates that these reforms are not likely to have a major impact on gambling behaviour, as outlined in Table 39. This is because the reforms are predominately structural in nature, rather than changing the gambling experience of individual customers<sup>95</sup>.

Two new harm minimisation measures relating to use of technology are to be investigated by the Commission that may moderate gambling behaviour.<sup>96 97</sup> The extent of the impact will be analysed by the Commission in its investigations on the introduction of these measures.

A potential impact arising from the proposed reforms is changes to the behaviour of individual venues regarding EGMs. As noted by the Minister for Finance, the reforms provide:

*...hotel and club operators with a greater say in how they run the EGM component of their businesses. They will have the authority to purchase, sell or lease their own EGMs, and*

<sup>93</sup> [2<sup>nd</sup> Reading Speech for Gaming Control Amendment \(Future Gaming Market\) Bill 2021](#), Hon Michael Ferguson, MP, Minister for Finance, House of Assembly, 14 October 2021

<sup>94</sup> The analysis was desktop, supplemented by discussions with Liquor and Gaming Branch staff

<sup>95</sup> [2<sup>nd</sup> Reading Speech for Gaming Control Amendment \(Future Gaming Market\) Bill 2021](#), Hon Michael Ferguson, MP, Minister for Finance, House of Assembly, 14 October 2021

<sup>96</sup> [Pre-commitment systems for electronic gambling machines - Preventing harm and improving consumer protection](#), A Rintoul and A Thomas, AGRC Discussion Paper No. 9, 2017

<sup>97</sup> [Gaming Machines Amendment \(Gambling Harm Minimisation\) Bill 2020 - Explanatory paper](#), Liquor & Gaming NSW, 2017

*will have more choice in how machines operate, within the State’s strictly regulated framework.*

He also observed that the while the reforms place greater responsibility on venue operators, they also provide:

*...hotel and club operators with a greater share of returns.*

Specifically, with hotels and clubs having their own licences and being responsible for almost all aspects of EGM operations in their venue, there is potential for them to adopt a variety of approaches to attracting gambling customers. This situation might see increased diversity in advertising, inducement and player loyalty program activities by hotels and clubs compared to those of the central operator that presently exists.

In addition, there is the potential for some changes to gambling behaviour in relation to the introduction of automated table games to general casinos and the ability of endorsed hotels, clubs and totalizators to offer the simulated racing event ‘Trackside’. In both instances, these changes increase the gambling options available to patrons. It is not possible within the scope of this paper to determine the overall effect as use of these new gambling options may be offset by substitution of gambling activity away from other existing options.

Table 39: Potential Impacts of Future Gaming Market Reforms on gambling market behaviour

Reform <sup>98</sup>	Potential impact on gambling market behaviour
Decreasing the state wide EGM cap by 150 machines	This reform will reduce the opportunities for gambling on EGMs in Tasmania.  It may also see substitution away from EGM gambling to other forms of gambling.
Introducing individual venue licences to operate EGMs in hotels and clubs <ul style="list-style-type: none"> <li>• Venue operators to be responsible for almost all aspects of EGM operations in their venue</li> <li>• From a customer perspective, the way EGM gaming operates will not change</li> <li>• Venues will retain a greater share of EGM revenue and have more choice in how they run their EGM gaming business.</li> </ul>	As the move from a single operator model to a multi-operator model will not change EGM operations, the individual behaviour of customers using EGMs is not expected to change.  There is a risk that hotels and clubs may adopt a variety of approaches to attracting gambling customers as they seek to cover costs associated with their new arrangements.  This might see increased diversity in advertising and inducement activities and player loyalty programs.  This in turn may result in an increase in gambling on EGMs in hotels and clubs.
Introducing a separate Keno Operators licence – there will continue to be only one licenced operator (the Federal Group). <ul style="list-style-type: none"> <li>• Individual hotels and clubs will require an endorsement on their venue licence to offer Keno</li> </ul>	As the new arrangements do not change Keno operations from a player perspective, the gambling behaviour of customers is not expected to change.  Keno will continue to be provided to venues by the licenced Keno operator under commission arrangements, with the operator still providing promotion and advertising for Keno. Consequently,

<sup>98</sup> Sourced from the Tasmanian Government’s stage two consultation papers and fact sheets on its Future Gaming Market policy located on the [Department of Treasury and Finance website](#) as at 7 October 2021

Reform <sup>98</sup>	Potential impact on gambling market behaviour
<ul style="list-style-type: none"> <li>From a customer perspective, the way Keno gaming operates will not change</li> <li>Keno will continue to be provided to venues by the licensed Keno operator, with venues to receive commissions on Keno tickets sold.</li> </ul>	<p>it is not expected that hotels and clubs will change their approach to providing Keno.</p>
<p>Offering up to two new high roller non-resident casino licences. For these casinos</p> <ul style="list-style-type: none"> <li>EGMs will not be permitted</li> <li>Minimum bet amounts will be prescribed by regulation.</li> </ul>	<p>This will establish a separate market for high-roller gambling activities for non-Tasmanian residents.</p> <p>No impact is expected on Tasmanian resident gambler behaviour.</p> <p>This reform may see</p> <ul style="list-style-type: none"> <li>an increase in gambling activity as patrons visit these high roller casinos from interstate/overseas</li> <li>some substitution in gambling activity by interstate/overseas gambling patrons away from the two existing Tasmanian casinos.</li> </ul>
<p>Establishing a more appropriate distribution of returns from gaming</p> <ul style="list-style-type: none"> <li>The Return to Player (RTP) minimum will be increased from 85% to 87%.</li> <li>The State Government and hotels and clubs will receive a larger share of the takings from EGMs.</li> </ul>	<p>No impact is expected on venue behaviour or gambler behaviour from this reform.</p>
<p>Establishing a separate Licensed Monitoring Operator to monitor the hotel and club EGM network.</p>	<p>No impact expected on venue behaviour or gambler behaviour from this reform.</p>
<p>Changes to automated table games arrangements:</p> <ul style="list-style-type: none"> <li>Fully Automated Table Games will be allowed to operate in casinos.</li> </ul>	<p>This reform may see:</p> <ul style="list-style-type: none"> <li>an increase in gambling activity as patrons use this alternative to other forms of gambling available in general casinos</li> <li>some substitution of gambling activity away from other forms of gambling available in general casinos.</li> </ul>
<p>Removing the monopoly on simulated racing events</p> <ul style="list-style-type: none"> <li>Federal Group's exclusivity to operate the simulated racing event known as Trackside as a casino game will be removed.</li> <li>This will enable simulated racing events to be operated by the totalizator operator UBET TAS Proprietary Limited in endorsed hotels, clubs and totalizator outlets (but not online)</li> </ul>	<p>This reform will provide patrons with an alternative form of gambling in endorsed hotels, clubs and totaliser outlets.</p> <p>This reform may see:</p> <ul style="list-style-type: none"> <li>an increase in gambling activity as patrons use this alternative in addition to the existing gambling options in those venues</li> <li>some substitution of gambling activity away from EGMs, Keno and live race wagering.</li> </ul>



Reform <sup>98</sup>	Potential impact on gambling market behaviour
<p>Increasing funding to improve harm minimisation:</p> <ul style="list-style-type: none"> <li>• This will be achieved by an increase in the CSL</li> <li>• The Government has guaranteed that the CSL funding pool will be double the CSL amount raised just prior to commencement. The Government will provide a direct contribution to make up any shortfall in the CSL revenue that may be experienced.</li> </ul>	<p>This reform is expected to ameliorate the impact of problem gambling by increasing available resources to assist in minimising harms from gambling.</p>

The implications of this analysis on the Tasmanian Code are considered in Section 6.

## 6 Summary

### 6.1 Key Changes in Gambling Regulation since 2017

Since 2017, as a result of the first review, the Tasmanian Code has seen updates to 11 controls across the gambling operations areas of inducements, player loyalty programs, access to cash, payment of winnings and service of food and alcohol. The areas of advertising and inducements were more recently amended where necessary to align with the harm minimisation principles of the National Consumer Protection Framework for online wagering.

There has also been a moderate level of change to harm minimisation and responsible gambling controls nationally, as shown in Table 40.

Table 40: Control areas that have seen legislative change since 2017

Control Area	ACT	NSW	NT	Qld	SA	Vic	WA
1. Advertising	Yes	Yes		Yes	Yes	Yes	Yes
2. Inducements	Yes	Yes		Yes	Yes		
3. Player loyalty programs		Yes			Yes		
4. Access to cash					Yes	Yes	
5. Payment of winnings					Yes		
6. Lighting					Yes		
7. Service of food and alcohol		Yes			Yes		
8. Clocks in gambling areas					Yes		
9. Staff training		Ye			Yes		
10. Information to players	Yes	Yes		Yes	Yes	Yes	

### 6.2 Comparison of Tasmanian Code against other Australian Jurisdictions

The comparison of the Tasmanian Code to the controls in other jurisdictions showed that on balance Tasmania has more harm minimisation and responsible gambling controls.

There were four controls within the Tasmanian Code where no comparable control was identified in any other jurisdiction, these being:

- 2.2 – Incentive-based sponsorship must not be offered
- 2.7 – An entrant in a promotional prize draw, where the value of any individual prize is greater than \$1 000, must not be required to attend the draw in order to win a prize in that draw

- 3.2 – Foreign games permit holders must provide a player activity statement (as prescribed in 3.1(a)) on request, but no more than twice per year. Unless requested, player activity statements must not be distributed to members who have not gambled within the previous six months. The statement must show the amount, in dollars, of any expenditure during the period.
- 7.1 – A person must not be served food while playing, or seated at, a gaming machine between 6 pm and close of gambling each day.

There are some controls in other jurisdictions that exceed what is covered in the Tasmanian Code, that is, where:

- the scope of those controls goes beyond that in the Tasmanian Code
- similar controls exist but are applied to other types of gambling not subject to those controls in Tasmania, or
- Tasmania does not have a comparable control.

Instances where these controls occur are detailed in Table 41. In the case of additional controls that go beyond the scope of the control areas in the Tasmanian Code, they are indicated with an asterisk (\*).

It is beyond the scope of this paper to make definitive recommendations on which of these controls should be adopted in Tasmania. Rather, the Tasmanian Liquor and Gaming Commission should examine these identified controls to determine whether there is a need for them to be incorporated in the Tasmanian Code where legislation allows.

Table 41: Control areas where other jurisdictions exceed the Tasmanian Code

Jurisdiction	Has broader comparable controls	Applies comparable control to additional gambling activities	Tasmanian Code has no comparable control
ACT	4. Access to cash 5. Payment of winnings	1. Advertising 2. Inducements 6. Lighting 8. Clocks 9. Staff training	1. Advertising 2. Inducements 5. Payment of winnings 10. Information to players
NSW	1. Advertising 2. Inducements	1. Advertising 5. Payment of winnings	1. Advertising 2. Inducements
NT	1. Advertising	4. Access to cash 5. Payment of winnings 6. Lighting 7. Service of food and alcohol 8. Clocks	2. Inducements * Child care facilities * Community interaction * Gambling premises * Gambling research
Qld	2. Inducements 3. Player loyalty programs	2. Inducements 4. Access to cash 5. Payment of winnings 7. Service of food and alcohol 8. Clocks	1. Advertising 5. Payment of winnings 9. Staff training * Community interaction * Gambling premises



Jurisdiction	Has broader comparable controls	Applies comparable control to additional gambling activities	Tasmanian Code has no comparable control
		10. Information to players	
SA	1. Advertising 2. Inducements 4. Access to cash	1. Advertising 2. Inducements 3. Player loyalty programs 5. Payment of winnings 7. Service of food and alcohol 8. Clocks	1. Advertising 2. Inducements 3. Player loyalty programs 4. Access to cash * Community interaction * Use of gaming machines
VIC	2. Inducements 3. Player loyalty programs 4. Access to cash	5. Payment of winnings 6. Lighting 7. Service of food and alcohol 8. Clocks 10. Information to players	1. Advertising 2. Inducements 4. Access to cash 6. Lighting * Community interaction
WA	1. Advertising 2. Inducements	2. Inducements 5. Payment of winnings 6. Lighting 7. Service of food and alcohol	* Breaks from play

As shown in Table 41, there are controls in other jurisdictions that are comparable to those in the Tasmanian Code but which apply to additional gambling activities. The number of times this happens for each jurisdiction and each gambling activity is shown in Table 42. ACT and SA apply controls more uniformly across gambling activities.

Table 42: Number of comparable controls in other jurisdiction that apply to additional gambling activity

Gambling Activities	ACT	NSW	NT	Qld	SA	VIC	WA	Total
Gaming machines	1	2	-	-	2	-	-	5
Table gaming	2	1	-	2	4	-	1	10
Keno	3	-	-	1	1	1	1	7
Terrestrial wagering	3	-	1	2	2	1	1	10
Online wagering	5	-	2	2	4	3	3	19
Lotteries	5	1	7	7	6	3	-	29
<b>Total</b>	<b>19</b>	<b>4</b>	<b>10</b>	<b>14</b>	<b>19</b>	<b>8</b>	<b>6</b>	<b>80</b>

## 6.3 Future Gaming Market Reforms

The analysis of the potential impact on gambling behaviour of the Future Gaming Market Reforms concluded that the reforms are predominantly structural in nature and are not likely to have a major impact on gambling behaviour. Notwithstanding, the Government has sought to improve harm minimisation by asking the Commission to investigate two new technology based measures (discussed in section 5).

It is not clear that any changes to the Tasmanian Code are warranted simply based on the identified potential impacts (see Table 39) given:

- The Tasmanian Code already contains a wide range of controls regarding the activities that could be impacted:
  - advertising is subject to 20 separate controls
  - inducements are subject to 8 separate controls
  - player loyalty programs are subject to 14 separate controls.
- The latter two control areas were strengthened by the Commission following the last review of the Tasmanian Code.
- The existing hotel and club venue operators that are to be granted new venue licences under the reforms are already conversant with the Tasmanian Code as they and their staff must comply with it from an operational perspective.

Rather, the challenge will be to ensure that in the move from a single gaming operator model for EGMs to an individual venue operator model that there is sufficient enforcement of the Tasmanian Code. In this respect, the Minister undertook at the 2021 Legislative Council Estimates Committee hearing on the Government's reforms that *'the government will resource the branch which supports the commission to adequately fulfil the commission's responsibilities which are, of course, very considerable'*.<sup>99</sup>

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<sup>99</sup> [Transcript of Legislative Council Estimates Committee A](#), 6 December 2021, p 53

## Appendix A. Responsible Gambling Mandatory Code of Practice for Tasmania

Table 43: Tasmanian Code – Summary of which controls apply to which gambling activities outlines how the controls contained within the Tasmanian Code are relevant to the different types of gambling activities. If the Tasmanian Code control does not apply to a particular type of gambling activity, this is denoted by an 'NA'.

Table 43: Tasmanian Code – Summary of which controls apply to which gambling activities

Tasmanian Code Control	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<b>1. Advertising</b>						
All advertising of gambling products by relevant prescribed licence holders must:						
1.1 Comply with the 'Code of Ethics' adopted by the Australian Association of National Advertisers.	✓	✓	✓	✓	✓	✓
1.2 Be socially responsible and consistent with the expectation that gambling will be conducted responsibly so as to minimise harm.	✓	✓	✓	✓	✓	✓
1.3 Not be offensive or indecent in nature, and not offend prevailing community standards.	✓	✓	✓	✓	✓	✓
1.4 Not be false, misleading or deceptive, including not misrepresenting the odds, the probability of winning a prize or the prizes that can be won.	✓	✓	✓	✓	✓	✓
1.5 Not give the impression that gambling is a reasonable strategy for financial betterment or enhancing social situation.	✓	✓	✓	✓	✓	✓
1.6 Not challenge or dare a person to play.	✓	✓	✓	✓	✓	✓
1.7 Not suggest that skill can influence games that are games of chance.	✓	✓	✓	✓	✓	✓
1.8 Not portray, condone or encourage gambling in combination with the consumption of alcohol. <i>This does not apply to advertising that shows celebrating a win in a responsible manner outside of a gambling venue.</i>	✓	✓	✓	✓	✓	✓
1.9 Not encourage or target people under 18 years of age to gamble.	✓	✓	✓	✓	✓	✓
1.10 Not show people who are under 25 years of age in gambling advertising unless:	✓	✓	✓	✓	✓	✓

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Tasmanian Code Control	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<p>a) their appearance is incidental as part of a natural situation; and</p> <p>b) they are not located in a gambling venue; and</p> <p>c) there is no implication that the person will participate in gambling.</p> <p><i>This does not apply to a person engaged to advertise or promote gambling as part of a sponsorship agreement, however the person must be over 18 years of age and must not be shown participating in gambling.</i></p>						
1.11 Not be directed at vulnerable or disadvantaged groups, where people may not have a capacity to fully understand the information, such as refugees or people with intellectual disabilities.	✓	✓	✓	✓	✓	✓
1.12 Not procure, incite or encourage a person to commit an offence.	✓	✓	✓	✓	✓	✓
1.13 Include responsible gambling messages in all media advertising that incorporates a standalone gambling message, for example, 'Gamble Responsibility' and the name and telephone number for the Gambling Helpline, to a size and form as approved by the Commission.	✓	✓	✓	✓	✓	✓
1.14 Not be directed at or provided to excluded persons.	✓	✓	✓	✓	✓	✓
1.15 Not involve irresponsible trading practices.	✓	✓	✓	✓	✓	✓
1.16 Not violate the confidentiality of information relating to, or the privacy of, players without the consent of the player.	✓	✓	✓	✓	✓	✓
<p>1.17 Not occur on television and/or radio between:</p> <p>i) 6:00am - 8:30am and 4:00pm - 7:00pm weekdays; and</p> <p>ii) 6:00am - 8:30am and 4:00pm - 7:30pm on weekends.</p> <p><i>The following forms of advertising are exempt from the above periods:</i></p> <p>a) <i>advertising during a racing or sports broadcast; and</i></p> <p>b) <i>advertising that focuses specifically on entertainment or dining facilities and does not</i></p>	✓	✓	✓	✓	✓	NA



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Tasmanian Code Control	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<i>depict or refer to gambling in any way.</i>						
1.18 Not include sounds associated with gaming machine operation in any television or radio advertising.	✓	NA	NA	NA	NA	NA
1.19 Not promote to customers, or prospective customers, the provision of credit by a third party, e.g., pay day lenders.	NA	NA	NA	NA	✓	NA
1.20 Not be sent or directly marketed to an account holder unless that person has provided their express consent to receive the marketing. No further direct marketing materials can be sent to that person once an unsubscribe request is received and processed.	NA	NA	NA	NA	✓	NA
<b>2. Inducements</b>						
2.1 Relevant prescribed licence holders must not offer or provide incentives or benefits to other prescribed licence holders or staff as a reward to purposefully encourage other people to gamble, re invest or replay winnings. <i>This requirement does not apply to arrangements between Foreign Games Permit/Tasmanian Gaming Licence holders and their approved lottery/totalisator outlets.</i>	✓	✓	✓	✓	✓	✓
2.2 Incentive-based sponsorship must not be offered.	✓	✓	✓	✓	✓	✓
2.3 People must not be offered free vouchers (or tokens and the like) of a value greater than \$15 which can be used for gambling purposes. This includes multiple vouchers at the same time where the combined value would exceed \$15. <i>Any voucher or token, regardless of the amount that it is issued for, must be redeemable for services other than just gambling, for example, accommodation, dining or entertainment. Any voucher offered, other than for a specific event, must be valid for a minimum period of 30 days.</i>	✓	✓	✓	✓	NA	✓
2.4 Customers must not be offered: a) any vouchers, reward or other benefit as an incentive to open a betting account or refer another person to open a betting account; and	NA	NA	NA	NA	✓	NA



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Tasmanian Code Control	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
b) bonus bets unless winnings from a bet made with that bonus bet can be withdrawn without being subject to any turnover requirements.						
2.5 People must not be offered free or discounted alcohol for consumption on the premises (including vouchers for the purchase of alcohol) as an inducement or a reward for gambling. <i>This practice does not apply to private gaming areas at a casino, to players participating in a casino table gaming tournament or where alcohol is provided with food at a location outside of a gaming area.</i>	✓	✓	✓	✓	NA	✓
2.6 People must not be required to gamble more than \$10 for a specific period of time in order to receive an inducement, obtain a prize or enter a specific prize draw.	✓	✓	✓	✓	NA	NA
2.7 An entrant in a promotional prize draw, where the value of any individual prize is greater than \$1000, must not be required to attend the draw in order to win a prize in that draw	✓	✓	✓	✓	NA	✓
2.8 Jackpot prize amounts that can be won on gaming machines must be limited to: a) \$25,000 maximum for stand-alone progressive jackpots; and b) \$60,000 maximum for linked jackpot arrangements. <i>The jackpot limits do not apply to casinos.</i>	✓	NA	NA	NA	NA	NA
<b>3. Player loyalty programs</b>						
3.1 Where player activity is recorded, player activity statements must: a) provide concise and meaningful information about the player's gambling history including at a minimum: i) the turnover amount, in dollars, for the previous six months, ii) number of hours spent at gaming machines for the previous six months (where applicable), iii) the net amount, in dollars, won or lost for	✓	✓	✓	✓	✓	NA



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Tasmanian Code Control	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
<p>the previous six months,</p> <p>iv) five year cumulative tallies of the same information above, and</p> <p>v) points accrual separately for gambling and non-gambling activities (where applicable);</p> <p>b) not contain gambling advertising and any other irrelevant information not pertinent to the gambling record of the player; and</p> <p>c) be delivered to program member at least every six months to their home postal address UNLESS measure 3.3 applies which prohibits statements being sent to program members who have not gambled within the previous six months.</p>						
<p>3.2 Foreign games permit holders must provide a player activity statement (as prescribed in 3.1(a)) on request, but no more than twice per year. Unless requested, player activity statements must not be distributed to members who have not gambled within the previous six months. The statement must show the amount, in dollars, of any expenditure during the period.</p>	NA	NA	NA	NA	NA	✓
<p>3.3 Gambling related contact must not be initiated with program members who have not gambled within the previous six-month activity statement reporting period (where player activity is recorded). All forms of gambling communication are prohibited including in writing, in person, by telephone, internet or other electronic means. Any form of non-gambling communication must not refer to gambling in any way.</p>	✓	✓	✓	✓	✓	✓
<p>3.4 Detailed information about the operation of the program must be made available at the time of joining.</p>	✓	✓	✓	✓	✓	✓
<p>3.5 Unless measure 3.3 applies, program members must be sent self-exclusion and responsible gambling information, as approved and/or prescribed by the</p>	✓	✓	✓	✓	✓	NA



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Tasmanian Code Control	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
Commission, at least once each year.						
3.6 Program members must be able to opt out of the program at any time and, unless 3.3 applies, members must be notified at least once each year of their right to cease participation in the program.	✓	✓	✓	✓	✓	NA
3.7 Program members must be able to access any program information that the operator holds about them.	✓	✓	✓	✓	✓	✓
3.8 Information held about the program and its members must be made available to the Commission upon request. Where personal information is provided, the Commission will ensure that the Personal Information Protection Principles of the <i>Personal Information Protection Act 2004</i> will apply. Any information provided for research purposes must not identify individuals.	✓	✓	✓	✓	✓	✓
3.9 Program point accrual must not focus exclusively on gambling activities where other venue activities are available (for example, accommodation, dining or entertainment).	✓	✓	✓	✓	✓	✓
3.10 The accumulation rate of reward points for gambling activities and any benefits offered must be the same for all members of the program and must not vary.	✓	✓	✓	✓	✓	✓
3.11 Membership in a program must not be available to minors or excluded People.	✓	✓	✓	✓	✓	✓
3.12 Responsible gambling messages, as approved by the Commission, must be incorporated and prominently displayed in all program documentation.	✓	✓	✓	✓	✓	✓
3.13 Programs must not offer rewards to members greater than \$15 which can be used for gambling purposes.	✓	✓	✓	✓	✓	✓
3.14 Programs must not offend prevailing community standards.	✓	✓	✓	✓	✓	✓
<b>4. Access to cash</b>						
4.1 Automatic teller machines must not be located on any premises (other than a casino) that operates gaming machines, keno or totalisator wagering.	✓	✓	✓	✓	NA	NA



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Tasmanian Code Control	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
4.2 Casino operators must ensure that customers are not able to withdraw more than \$400 per day from any debit or credit card at automatic teller machines located at a casino.	✓	✓	✓	✓	NA	NA
4.3 A casino operator must not allow a person to obtain, from a cash facility, a cash advance from a credit account.	✓	✓	✓	✓	NA	NA
4.4 Responsible gambling messages must be clearly visible on or near all automatic teller machines located on a casino premises.	✓	✓	✓	✓	NA	NA
4.5 EFTPOS cash withdrawal transactions processed by: a) all venues (excluding casinos) are limited to a maximum amount of \$200 for any purpose and no more than one EFTPOS transaction is permissible, per day, per customer. b) casinos are limited to a maximum amount of \$200 for gambling purposes and no more than one EFTPOS transaction is permissible, per day, per customer. <i>These requirements do not apply to the part of the premises specifically designed for off-sales (i.e. bottle shops).</i>	✓	✓	✓	✓	NA	NA
4.6 Cheques must not be cashed on licensed premises, unless an exemption from this requirement has been approved by the Commission. <i>This restriction does not apply to international customers.</i>	✓	✓	✓	✓	NA	NA
4.7 Where an exemption has been granted under 4.6 or the customer is an international visitor: a) no more than one cheque is permitted to be cashed, per day, per customer at: i) all venues (excluding casinos) to the maximum value of \$100 for gambling purposes; and ii) casinos to a maximum value of \$200 for gambling purposes; and b) before a cheque is cashed for gambling purposes, the operator must check	✓	✓	✓	✓	NA	NA



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Tasmanian Code Control	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
whether the person is excluded from gambling.						
4.8 Coin change machines must be located in the line of sight of main staffed areas of the venue directly supervised by staff and in the position approved by the Commission.	✓	✓	✓	✓	NA	NA
4.9 Bank deposits, electronic funds transfers or any form of digital payments must not be accepted from customers to use for gambling purposes. <i>This restriction does not apply to devices used for accessing cash from ATMs and EFTPOS under measures 4.2 and 4.5.</i>	✓	✓	✓	✓	NA	NA
5. Payment of winnings						
5.1 A maximum cash limit of \$1000 applies for all keno and gaming machine payouts at any venue. Any payments above \$1000 must be made by cheque or, if requested by a customer, direct bank transfer is allowable where the venue can accommodate the transfer.	✓	NA	✓	NA	NA	NA
5.2 People must be provided with the option of having gambling winnings in excess of \$300 paid by cheque or, if requested by a customer, direct bank transfer is allowable where the venue can accommodate the transfer. Venues may take up to 24 hours to provide any cheque for the payment of winnings, except in the case of weekends or public holidays, where payment must be made by the next business day.	✓	NA	✓	NA	NA	NA
5.3 Before a cheque or direct bank transfer for the payment of winnings is issued, the exclusion database must be checked to identify whether the person has been excluded from gambling.	✓	NA	✓	NA	NA	NA
5.4 All cheques provided to customers for the payment of winnings from gaming machine or keno gaming must have the words 'Gaming Machine Payout' or 'Keno Payout' and be crossed 'Account Payee Only, Not Negotiable' on the front of the cheque.	✓	NA	✓	NA	NA	NA
6. Lighting						
6.1 There must be adequate lighting in gaming machine and table gaming areas to enable clocks	✓	✓	NA	NA	NA	NA



Tasmanian Code Control	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
and signs to be easily read and the faces of people within the room to be easily identified. This can be achieved by: a) not removing natural light sources from gaming rooms; and b) using natural light as a source of lighting, where possible.						
<b>7. Service of food and alcohol</b>						
7.1 A person must not be served food while playing, or seated at, a gaming machine between 6 pm and close of gambling each day.	✓	NA	NA	NA	NA	NA
7.2 A person must not be served alcohol in: a) venues (excluding casinos) while playing, seated or standing at a gaming machine at any time. b) casinos while playing, seated or standing at a gaming machine between 6 pm and close of gambling each day.	✓	NA	NA	NA	NA	NA
7.3 Any person who appears to be intoxicated must be prevented from gambling.	✓	✓	✓	✓	NA	✓
<b>8. Clocks in gambling areas</b>						
8.1 Analogue clocks must be located in each area where gambling takes place.	✓	✓	✓	✓	NA	NA
8.2 A clock must be clearly visible to any person participating in gambling.	✓	✓	✓	✓	NA	NA
<b>9. Staff training in recognising people with gambling problems</b>						
9.1 Special employees are required to undertake the Responsible Conduct of Gambling training course.	✓	✓	✓	✓	✓	NA
9.2 Totalisator employees are required to undertake the Responsible Conduct of Gambling training course.	NA	NA	NA	✓	✓	NA
9.3 At least one person who has completed the Responsible Conduct of Gambling training course must be on duty at all times in each area where gaming machines operate.	✓	NA	NA	NA	NA	NA
9.4 Gambling operators must ensure that employees and agents are appropriately trained in the responsible conduct of gambling.	✓	✓	✓	✓	✓	✓



## FINAL REPORT

Tasmanian Code Control	Gaming machines	Table gaming	Keno	Terrestrial wagering	Online wagering	Lotteries
10. Information to players						
10.1 Information must be made available to players on:						
a) responsible gambling (including how to limit the amount of money that can be lost);	✓	✓	✓	✓	✓	✓
b) where to get help if gambling becomes a problem;	✓	✓	✓	✓	✓	✓
c) exclusion from gambling;	✓	✓	✓	✓	✓	NA
d) odds, pay scales, return to player and take out rates (where applicable).	✓	✓	✓	✓	✓	✓
10.2 Information must be displayed in high traffic areas, prominent positions and places of relative privacy.	✓	✓	✓	✓	NA	NA
10.3 Information must be displayed in prominent positions.	NA	NA	NA	NA	NA	✓
10.4 Information must be accessible through a gambling operator's internet website, if one exists.	✓	✓	✓	✓	✓	✓



## Appendix B. Other Jurisdictional Performance Research

The Tasmanian Social and Economic Impact Studies (SEIS) comprise a systematic triennium review of the social and economic impacts of gambling in Tasmania, including conduct of a prevalence survey to provide a picture of gambling behaviour at a Tasmanian population level. Other Australian jurisdictions have different approaches to assessing these impacts on their communities. The approaches identified are in Table 44.

Table 44: Jurisdictional harm minimisation and responsible gambling performance data approaches

Jurisdiction	Performance data approach
<b>Australian Government</b>	<p>The Australian Gambling Research Centre (ARGC) is a part of the statutory research agency the Australian Institute of Family Studies, and ‘...provides high quality, evidence-based publications and resources to increase the capacity and capability of policy-makers, researchers, and professionals working in the gambling sector.’<sup>100</sup></p> <p>There is overlap between the scope of the SEIS and the research undertaken by the ARGC. However, the wider scope of ARGC research includes:</p> <ul style="list-style-type: none"> <li>• <i>‘the harm caused by gambling to problem gamblers, the families and communities of problem gamblers, and those at risk of experiencing harm;</i></li> <li>• <i>measures that may be undertaken to reduce harm; and</i></li> <li>• <i>statistics and data on recreational gambling.’</i><sup>101</sup></li> </ul> <p>The ARGC research follows a theme-based research schedule, as opposed to the SEIS systematic triennium approach. Examples of ARGC research include:</p> <ul style="list-style-type: none"> <li>• <i>Gambling in Australia during COVID-19</i></li> <li>• <i>The relationship between gambling and domestic violence against women</i></li> <li>• <i>Wagering advertisements and inducements: Exposure and perceived influence on betting behaviour.</i><sup>102</sup></li> </ul> <p>There is also a partnership between the Commonwealth, State and Territory Governments called Gambling Research Australia (GRA). The GRA initiates and manages a national gambling research program which includes a wide range of research topics including:</p> <ul style="list-style-type: none"> <li>• interactive gambling</li> <li>• gambling behaviour impacts of electronic gambling machine jackpots</li> <li>• in-venue problem gambler indications.<sup>103</sup></li> </ul> <p>Gambling prevalence research is undertaken by the Commonwealth and appears to be published every two years, with recent examples comprising:</p> <ul style="list-style-type: none"> <li>• <i>Gambling in Australia</i> (published 2021)</li> <li>• <i>Gambling in Suburban Australia</i> (published 2019)</li> </ul>

<sup>100</sup> [About the Australian Gambling Research Centre](#), Australian Institute of Family Studies website. Accessed 8 November 2021

<sup>101</sup> Ibid. Accessed 8 November 2021

<sup>102</sup> [Publications](#), Australian Institute of Family Studies website. Accessed 8 November 2021

<sup>103</sup> [Gambling Research Australia](#), Gambling Research Australia website. Accessed 8 November 2021



Jurisdiction	Performance data approach
	<ul style="list-style-type: none"> <li>• <i>Gambling Activity in Australia</i> (published 2017).<sup>104</sup></li> </ul>
<p><b>NSW</b></p>	<p>The Office of Responsible Gambling through the Responsible Gambling Fund ‘...funds research to support the development of evidence-based policy and programs in the area of responsible gambling.’<sup>105</sup></p> <p>The research undertaken is non-systematic in nature and has varied research themes which include:</p> <ul style="list-style-type: none"> <li>• youth gambling</li> <li>• shutdown periods for electronic gaming machines</li> <li>• responsible conduct of gambling</li> <li>• gambling prevalence surveys</li> <li>• national studies of interactive gambling.</li> </ul> <p>The gambling prevalence surveys have been undertaken by in NSW on an ad-hoc basis, with recent examples comprising:</p> <ul style="list-style-type: none"> <li>• <i>NSW Gambling Survey 2019</i></li> <li>• <i>Prevalence of Gambling and Problem Gambling in New South Wales</i> (published 2012)</li> <li>• <i>Prevalence of Gambling and Problem Gambling in NSW – A Community Survey 2006</i>.<sup>106</sup></li> </ul>
<p><b>VIC</b></p>	<p>Gambling research in VIC is a responsibility of the independent statutory authority - the Victorian Responsible Gambling Foundation (VRGF). This fund commissions research into problem gambling to ‘...build understanding of gambling harm...’<sup>107</sup> and to learn about the effects of gambling on Victorians.</p> <p>The research commissioned by the VRGF is undertaken on a more flexible basis than the SEIS, enabling a more agile response to emerging issues, whereas the more prescriptive SEIS approach allows for greater comparability between studies.</p> <p>In the VRGF research agenda for 2018-2022, the research themes include:</p> <ul style="list-style-type: none"> <li>• monitoring and surveillance</li> <li>• harm</li> <li>• gambling products</li> <li>• gambling environments</li> <li>• recovery and support.<sup>108</sup></li> </ul> <p>Gambling prevalence research has been conducted in VIC on an ad-hoc basis with large population surveys being undertaken in 2018-19, 2014 and 2008.<sup>109</sup></p>

<sup>104</sup> [Publications](#), Australian Institute of Family Studies website. Accessed 8 November 2021

<sup>105</sup> [Published research](#), Office of Responsible Gambling website. Accessed 8 November 2021

<sup>106</sup> Ibid. Accessed 30 November 2021

<sup>107</sup> [Foundation research program](#), Victorian Responsible Gambling Foundation website. Accessed 8 November 2021

<sup>108</sup> [Research Agenda 2018-2022](#), Victorian Responsible Gambling Foundation website. Accessed 8 November 2021

<sup>109</sup> [Victorian population gambling and health study 2018-19](#), Victorian Responsible Gambling Foundation website. Accessed 8 November 2021



Jurisdiction	Performance data approach
<p><b>Qld</b></p>	<p>The Office of Regulatory Policy (OFG), within the Office of Liquor and Gaming Regulation (OLGR), funds research to give ‘...us a <i>better understanding of liquor and gambling activities and issues in our local communities</i>.’<sup>110</sup></p> <p>Presently, the OFG takes a non-systematic approach to research that covers a wide range of research themes, including:</p> <ul style="list-style-type: none"> <li>• responsible gambling strategies for older people</li> <li>• workplace influences on responsible gambling in gaming venues.</li> </ul> <p>Qld has undertaken five household gambling surveys which were undertaken at varying time intervals which provide data on population level indicators for gambling behaviour / prevalence.</p>
<p><b>SA</b></p>	<p>Gambling research is funded by the Office of Problem Gambling, an office within the Department of Human Services, through the Gamblers Rehabilitation Fund. This research is non-systematic and covers a wide range of research themes including:</p> <ul style="list-style-type: none"> <li>• gambling prevalence</li> <li>• simulated gambling games.<sup>111</sup></li> </ul> <p>There have been six gambling prevalence surveys in SA since 1995, the most recent of which were the 2018, 2012 and 2005 surveys.</p> <p>Additionally, the South Australian Treasury has recently commissioned the South Australian Centre for Economic Studies (SACES) ‘...to <i>analyse the economic, financial and social impact of the gambling industry within the state</i>...’<sup>112</sup></p>
<p><b>ACT</b></p>	<p>The Australian Capital Territory Gambling and Racing Commission ‘...<i>monitors and researches the social effects of recreational gambling as well as gambling that may cause harm. Results from research are used to inform policies and programs that minimise the harm that can be caused by gambling and to target information and early intervention campaigns</i>.’<sup>113</sup></p> <p>The Commission set a research agenda for 2021-2024 with the objective of preventing and reducing gambling harm. The themes for this research include:</p> <ul style="list-style-type: none"> <li>• Monitoring</li> <li>• Community impact</li> <li>• Modes of gambling</li> <li>• Harm prevention</li> <li>• Treatment.<sup>114</sup></li> </ul> <p>This approach has similarities to the SEIS, but is not driven by a statutory review mechanism and has a more varied scope.</p> <p>Gambling prevalence surveys are run every five years in the ACT, the most recent published report being the <i>2019 ACT Gambling Survey</i>.<sup>115</sup></p>

<sup>110</sup> [Gambling research](#), Department of Justice and Attorney-General website. Accessed 8 November 2021

<sup>111</sup> [Research and Studies](#), Problem Gambling website. Accessed 8 November 2021

<sup>112</sup> [Publications](#), The University of Adelaide website. Accessed 8 November 2021

<sup>113</sup> [Research commitment](#), Gambling and Racing Commission website. Accessed 8 November 2021

<sup>114</sup> [Research Agenda 2021-2024](#), p 2

<sup>115</sup> [2019 ACT Gambling Survey](#), Australian National University website. Accessed 30 November 2021



Jurisdiction	Performance data approach
NT	<p>Gambling research in the Northern Territory is funded by the Director of Gaming Control through the Community Benefit Fund. Money in the fund may be used for ‘...research into gambling activity, including the social and economic impact of gambling on individuals, families and the community.’<sup>116</sup></p> <p>Funded research is undertaken on a non-systematic basis and has involved varied research themes. Examples of past research include:</p> <ul style="list-style-type: none"> <li>• Northern Territory Gambling Qualitative Study</li> <li>• Gambling Harm in the Northern Territory – An Atlas of Venue Catchments May 2014.<sup>117</sup></li> </ul> <p>Gambling prevalence research has been undertaken on an ad-hoc basis in the NT, with recent examples comprising:</p> <ul style="list-style-type: none"> <li>• Northern Territory 2018 Gambling Prevalence and Wellbeing Survey</li> <li>• Northern Territory 2015 Gambling Prevalence and Wellbeing Survey</li> <li>• Northern Territory 2005 Gambling Prevalence Survey: An Extended Analysis.<sup>118</sup></li> </ul>

<sup>116</sup> [Gaming Control Act 1993](#), p 44-45

<sup>117</sup> [Gambling research](#), Department of Industry, Tourism and Trade website. Accessed 8 November 2021

<sup>118</sup> Ibid. Accessed 30 November 2021



## Appendix C. Gambling Harm Minimisation Legislative Amendments Since 2017

### Australian Capital Territory

Table 45: Australian Capital Territory – Gambling Harm Minimisation Legislative Amendments

Legislative Instrument	Control Area	Amendment Summary
Gambling and Racing Control (Code of Practice) Regulation 2002	1. Advertising 2. Inducements 10. Information to players	Requires licensees to: <ul style="list-style-type: none"> <li>• Inform players of deposit limits</li> <li>• Provide information on betting accounts on request</li> <li>• Make it simple and easy to close betting accounts.</li> </ul> Totalisator licensees cannot offer inducements to open or get another person a betting account. Totalisator and sports bookmaking licensees can provide bonus bets or undertake direct marketing if they meet certain conditions.
Gaming Machine Act 2004	10. Information to players	Requires linked jackpot information to be available on request. Adds the requirement that club directors must discharge their duties in a way that reduces gambling harm. Adds further definition to where warning notices are to be put.

### New South Wales

Table 46: NSW – Gambling Harm Minimisation Legislative Amendments

Legislative Instrument	Area of Control	Amendment Summary
Betting and Racing Act 1998	1. Advertising 2. Inducements 10. Information to players	Places prohibitions on: <ul style="list-style-type: none"> <li>• direct marketing to betting account holders</li> <li>• providing inducements to open or not close a betting account</li> <li>• providing inducements at a race course</li> <li>• certain gambling-related advertisements.</li> </ul> Requires betting account holders to set limits. Allows the Commissioner of Police to exclude people from entering race courses.
Betting and Racing Regulation 2012	1. Advertising 10. Information to players	Requires the inclusion of gambling help advisory messages on:

Legislative Instrument	Area of Control	Amendment Summary
		<ul style="list-style-type: none"> <li>gambling advertisement by licensed betting service providers</li> <li>betting tickets supplied by a bookmaker.</li> </ul> <p>Sets out the approval of problem gambling pamphlets or brochures.</p>
Casino Control Act 1992	2. Inducements 3. Player loyalty programs 10. Information to players	<p>Sets the circumstances when complementary chips can be provided to patrons.</p> <p>Outlines required payments to be made to the Responsible Gambling Fund.</p> <p>Expands requirements on the:</p> <ul style="list-style-type: none"> <li>process for reviewing exclusion orders</li> <li>provision of a summary of game rules to players.</li> </ul> <p>Prohibits minors and excluded persons from wagering.</p>
Gaming Machines Act 2001	2. Inducements 9. Staff training	<p>Prohibits allowing another party offer or present a player with promotional prizes.</p> <p>No longer allows interim responsible conduct of gambling certificates to be provided.</p> <p>Responsible conduct of gambling training courses to be delivered by an approved provider.</p> <p>Adds a cap to the number of gaming machines allowed in a defined area (e.g. a local government area).</p>
Public Lotteries Regulation 2016	10. Information to players	<p>Allows approved problem gambling brochures to be in any language other than English, rather than a defined subset of languages.</p> <p>Requires public lottery tickets to be printed with problem gambling advisory messages</p>
Totalizator Act 1997	1. Advertising 2. Inducements 3. Player loyalty programs 7. Service of food and alcohol	<p>Tightens control of publishing of totalizator advertising from within or outside of NSW.</p> <p>Prohibits:</p> <ul style="list-style-type: none"> <li>advertising from being published during a sporting event</li> <li>the provision of liquor as an inducement to play</li> <li>direct marketing to account holders.</li> </ul>
Totalizator Regulation 2012	10. Information to players	<p>Allows approved problem gambling brochures to be in any language other than English, rather than a defined subset of languages.</p> <p>Sets the required problem gambling advisory message</p>



## Northern Territory

Table 47: NT – Gambling Harm Minimisation Legislative Amendments

Legislative Instrument	Control Area	Amendment Summary
Licensing (Director-General) Repeal Act 2014	Nil	Transferred the functions of the Northern Territory Licensing Commission to Licensing NT.

## Queensland

Table 48: Qld - Gambling Harm Minimisation Legislative Amendments

Legislative Instrument	Control Area	Amendment Summary
Interactive Gambling (Player Protection) Act 1998	1. Advertising 2. Inducements 10. Information to players	Prohibits: <ul style="list-style-type: none"> <li>providing inducements to a person in Qld to open, refer another person to open, or to close an interactive wagering account</li> <li>offering free bets to account holders unless they can withdraw the payout from the bet at any time</li> <li>direct marketing to a person in Qld unless the person has given express or informed consent</li> <li>Requires operator to identify person's location when they place a wager.</li> </ul>
Wagering Act 1998	1. Advertising 2. Inducements 10. Information to players	Same as above

## South Australia

Table 49: SA – Gambling Harm Minimisation Legislative Amendments

Legislative Instrument	Control Area	Amendment Summary
Authorised Betting Operations Act 2000	10. Information to players	Added Gambling Administration guideline regarding systems and procedures designed to prevent betting by children
Casino Act 1997	9. Staff training in recognising people with gambling problems	Inserted sections regarding: <ul style="list-style-type: none"> <li>casino management and staff which defined the special employees' role to include '...duties relating to intervention programs for patrons adversely affected by, or at risk of harm from, gambling'.</li> </ul>

Legislative Instrument	Control Area	Amendment Summary
	10. Information to players	<ul style="list-style-type: none"> <li>Liquor and Gaming Commissioner and the Commissioner of Police to bar people.</li> </ul>
Gambling Administration Act 2019	Nil	<p>The Act commenced and the objects of this Act are:</p> <ul style="list-style-type: none"> <li>to reduce the prevalence and severity of harm associated with the misuse and abuse of gambling activities</li> <li>to foster responsible conduct in relation to gambling and, in particular, to ensure that gambling is conducted responsibly, fairly and honestly, with regard to minimising the harm associated with gambling</li> <li>to facilitate the balanced development and maintenance, in the public interest, of an economically viable and socially responsible gambling industry in the State recognising the positive and negative impacts of gambling on communities</li> <li>to ensure that gambling is conducted honestly and free from interference, criminal influence and exploitation</li> <li>to ensure, as far as practicable, that the conduct of gambling is consistent with the expectations and aspirations of the public.</li> </ul> <p>This Act also:</p> <ul style="list-style-type: none"> <li>added gambling administration guidelines: <ul style="list-style-type: none"> <li>Automated Risk Monitoring Systems</li> <li>Facial Recognition System Provider Requirements</li> <li>Facial Recognition Systems - Gaming Machine Licence</li> <li>Facial Recognition Systems - Casino Licence</li> </ul> </li> <li>a section on barring orders</li> <li>established the Gambling Advisory Council.</li> </ul>
Gambling Administration Regulations 2020	10. Information to players	<p>Outlined regulations on:</p> <ul style="list-style-type: none"> <li>the prohibition of participation in gambling for prescribed persons (barred people)</li> <li>evidence of age.</li> </ul>
Gaming Machines Act 1992	4. Access to cash 9. Staff training in recognising people with gambling problems 10. Information to players	<p>Outlined addition of guidelines to interpretation covering:</p> <ul style="list-style-type: none"> <li>Account Based Cashless Gaming Systems</li> <li>Ticket-In Ticket-Out Systems</li> <li>Employee Training.</li> </ul>



Legislative Instrument	Control Area	Amendment Summary
		Also, the definitions of social effect certificate, social effect inquiry and social effect principles were removed.
Gaming Machines Regulations 2020	1. Advertising 4. Access to cash 9. Staff training in recognising people with gambling problems 10. Information to players	The Regulation: <ul style="list-style-type: none"> <li>repealed by Gaming Machines Regulations 2005</li> <li>fixed the number of gaming machine entitlements (as a statutory objective) to 13 081</li> <li>outlined the gaming machines be operated by a licensee in compliance with the Voluntary Pre-commitment Code</li> <li>outlined the Voluntary Pre-commitment Code</li> <li>outlined cash restriction requirements for ticket-in ticket-out (TITO) systems.</li> </ul>
Gaming Machines Gambling Code of Practice	1. Advertising 2. Inducements 3. Player loyalty programs 4. Access to cash 5. Payment of winnings 6. Lighting 7. Service of food and alcohol 8. Clocks in gambling areas 9. Staff training in recognising people with gambling problems 10. Information to players	The objectives of the code are to: <ul style="list-style-type: none"> <li>to reduce the prevalence and severity of harm associated with the misuse and abuse of gambling activities</li> <li>to foster responsible conduct in relation to gambling and in particular, to ensure that gambling is conducted responsibly, fairly and honestly, with regard to minimising the harm associated with gambling</li> <li>to facilitate the balanced development and maintenance, in the public interest, of an economically viable and socially responsible gambling industry in the State recognising the positive and negative impacts of gambling on communities</li> <li>to ensure that gambling is conducted honestly and free from interference, criminal influence and exploitation</li> <li>to ensure, as far as practicable, that the conduct of gambling is consistent with the expectations and aspirations of the public.</li> </ul>

## Victoria

Table 50: VIC – Gambling Harm Minimisation Legislative Amendments

Legislative Instrument	Control Area	Amendment Summary
Gambling Regulation Act 2003	1. Advertising 4. Access to cash	Unpaid jackpots to be paid to the Responsible Gambling Fund.  Requires wagering service providers to comply with harm minimisation directions issued by the Minister.

Legislative Instrument	Control Area	Amendment Summary
		<p>Gives the Minister power to set who and what needs to be complied with responsible gambling codes of conduct. Codes of conduct to be reviewed every 5 years.</p> <p>Ministerial directions can be given about self-exclusion programs.</p> <p>Prohibits:</p> <ul style="list-style-type: none"> <li>• inducements involving cashless gaming</li> <li>• credit accounts used to obtain a non-cash gaming token or increase its value</li> <li>• exchange of tokens for cheques</li> <li>• displaying betting advertising on public transport, near a school or near a public road</li> </ul>
Gambling Regulations 2015	4. Access to cash 9. Staff training	<p>Sets max value of non-cash gaming token and additional responsible gambling training modules for staff.</p> <p>Gaming machine credits cannot be made with a non-cash gaming token that is a player card.</p> <p>Ensures distance between cashless gaming terminals and gaming machines.</p>

## Western Australia

Table 51: Western Australia – Gambling Harm Minimisation Legislative Amendments

Legislative Instrument	Control Area	Amendment Summary
Gaming and Wagering Commission Act 1987	Nil	Cannot place a remote gambling device on a public premises, which allows bets on an event or contingency
Gaming and Wagering Commission Regulations 1988	1. Advertising	Makes amendments to the restrictions on gambling advertising.

## Appendix D. Key Differences Between Tasmanian Code and Other Jurisdictions

In this appendix, the following colour coding is applied.

Table 52: Comparing Tasmania Code to other jurisdictional controls

Key	Description
More	Tasmania has a control that is larger in scope
Fewer	Tasmania has a control that is smaller in scope
Omitted	Tasmania does not apply a control to a gambling activity where the compared jurisdiction does
Additional	Tasmania has no equivalent control to the control identified in compared jurisdiction

### Australian Capital Territory

Table 53: Australian Capital Territory - Key Differences with Tasmanian Code

Tasmanian Code Section	Tasmanian Code Gambling Activity	ACT Controls
1.20	Gaming machines Table gaming Keno Terrestrial wagering	<b>ACT Code of Practice (1.30B)</b>  (1) This section applies only to a gaming machine licensee or casino licensee.  (2) A patron of a gambling facility may, in writing, ask the licensee of the facility to not send the patron promotional material.  (3) The patron may, in writing, revoke the patron's request under subsection (2) at any time.  (4) If a patron makes a request under subsection (2), and does not revoke the request under subsection (3), the licensee must not send any promotional material to the patron that is personally-addressed to the patron.
2.3	Gaming machines	<b>ACT Code of Practice (1.30)</b>  (3) A gaming machine licensee must not:  (b)(ii) cash, or free or discounted gambling credits, unless the offer of cash or credits is made to all patrons of the facility all of the time as part of the facility's usual or regular prize schedule.
2.5	Online wagering	<b>ACT Code of Practice (1.30)</b>  (1)(c) provides that the licensee must not conduct a promotion for or including gambling at the facility that includes an offer of free or discounted alcohol.
2.6	Online wagering	<b>ACT Code of Practice (1.30)</b>

Tasmanian Code Section	Tasmanian Code Gambling Activity	ACT Controls
	Lotteries	<p>(1) The licensee of a gambling facility must not:</p> <ul style="list-style-type: none"> <li>(a) conduct a promotion that requires or encourages people to gamble at the facility for a minimum period of time to qualify for rewards</li> <li>(b) conduct a promotion that requires or encourages people to gamble a minimum amount to qualify for rewards</li> </ul>
3.13	Gaming machines	<p><b>ACT Code of Practice (1.30)</b></p> <p>(8) If a person wishes to redeem points under a player reward scheme conducted by:</p> <ul style="list-style-type: none"> <li>(b) a gaming machine licensee at a gambling facility, the licensee must not offer a reward or benefit to the person if the value of the reward or benefit is more than \$1000.</li> </ul>
4.2	Gaming machines Table gaming Keno Terrestrial wagering	<p><b>Casino Control Act 2006 (110)</b></p> <p>(1) The casino licensee commits an offence if the licensee provides, or allows the provision of, a cash facility in the casino.</p> <p>cash facility:</p> <ul style="list-style-type: none"> <li>(a) means: <ul style="list-style-type: none"> <li>(i) an automatic teller machine; or</li> <li>(ii) an EFTPOS facility (other than an EFTPOS debit facility that is used only for payment for food or beverages); or</li> <li>(iii) any other facility for gaining access to cash or credit</li> </ul> </li> </ul>
4.6	Gaming machines	<p><b>ACT Code of Practice (1.24)</b></p> <p>(1) This section applies to a gaming machine licensee.</p> <p>(2) The licensee of a gambling facility to whom this section applies must not:</p> <ul style="list-style-type: none"> <li>(a) cash a cheque within a gaming area of the facility; or</li> <li>(b) allow a person to buy back or redeem a previously cashed personal cheque.</li> </ul>
4.6	Table gaming Keno Terrestrial wagering	<p><b>Casino Control Act 2006 (112)</b></p> <p>(1) The casino licensee commits an offence if—</p> <ul style="list-style-type: none"> <li>(a) the licensee accepts a cheque from a person; and</li> <li>(b) the cheque— <ul style="list-style-type: none"> <li>(i) is not a cheque prescribed by regulation; or</li> <li>(ii) is not accepted in a way prescribed by regulation.</li> </ul> </li> </ul> <p>(2) The casino licensee commits an offence if—</p> <ul style="list-style-type: none"> <li>(a) the licensee accepts or cashes a cheque at the request of a person; and</li> </ul>



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Tasmanian Code Section	Tasmanian Code Gambling Activity	ACT Controls
		<p>(b) the licensee has previously accepted or cashed a cheque at the request of the person that was not honoured on presentation; and</p> <p>(c) the debt incurred by the dishonoured cheque has not been discharged.</p> <p>(3) The casino licensee commits an offence if—</p> <p>(a) the licensee accepts a cheque that has not been redeemed under section 114; and</p> <p>(b) the licensee does not present the cheque for payment within the time determined by the commission under section 115.</p>
4.7	Gaming machines	<p><b>ACT Code of Practice (1.24)</b></p> <p>(3) The licensee of a gambling facility to whom this section applies must not:</p> <p>(a) cash a patron's personal cheque for more than \$250 on any day unless the person has made arrangements with the licensee on a previous day; or</p> <p>(b) cash a cheque of any other kind for the patron.</p>
4.7	Table gaming Keno Terrestrial wagering	<p><b>Casino Control Regulation 2006 (8)</b></p> <p>A cheque that meets the following requirements is prescribed:</p> <p>(a) the cheque is drawn in favour of the casino licensee or the person who presents the cheque;</p> <p>(b) the cheque is not postdated;</p> <p>(c) for a redeeming cheque—the cheque is not dated earlier than the date of the most recent of the cheques to be redeemed.</p>
5.1-5.2	Gaming machines	<p><b>ACT Code of Practice (1.23)</b></p> <p>(3) A gaming machine licensee must pay a gambling patron winnings from a gaming machine by cheque or electronic funds transfer if:</p> <p>(a) the winnings are more than \$300; and</p> <p>(b) the patron has requested the winnings be paid by cheque or electronic funds transfer.</p>
6.1	Keno Terrestrial wagering Online wagering Lotteries	<p><b>ACT Code of Practice (1.26)</b></p> <p>(3) The licensee of a gambling facility must ensure that lighting in the facility is adequate to allow clocks and signs required to be displayed under this code of practice to be clearly visible to people in the facility.</p>
8.2	Online wagering Lotteries	<p><b>ACT Code of Practice (1.26)</b></p> <p>(2) The licensee of a gambling facility must prominently display the correct time in the facility.</p>
9.2	Lotteries	<p><b>ACT Code of Practice (1.4)</b></p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	ACT Controls
		<p>(2) However, a licensee of a totalisator under the Totalisator Act 2014 and someone mentioned in section 1.1, definition of licensee, paragraph (f), need only ensure that the person in charge of each gambling facility:</p> <ul style="list-style-type: none"> <li>(a) has successfully completed an approved training program within the previous 3 years; and</li> <li>(b) does not take part, or allow anyone else to take part on their behalf, in a gambling activity at the facility except as part of the person's duty; and</li> <li>(c) is made aware of his or her obligations under this code of practice.</li> </ul>
9.3	<p>Table gaming Keno Terrestrial wagering Online wagering Lotteries</p>	<p><b>ACT Code of Practice (1.9)</b></p> <ul style="list-style-type: none"> <li>(1) A licensee of a gambling facility must not conduct gambling at the facility unless at least 1 gambling contact officer has been appointed for the facility.</li> <li>(2) A gambling contact officer for the facility may be the licensee or a person appointed by the licensee.</li> <li>(3) A person is eligible to be appointed as a gambling contact officer by the licensee only if the person has successfully completed an approved training program within the previous 3 years.</li> <li>(4) To remain eligible for appointment, a gambling contact officer must successfully complete an approved GCO training session in each year of the officer's appointment.</li> <li>(5) The commission may exempt a gambling contact officer, in writing, from complying with subsection (3) or (4).</li> <li>(6) An exemption may be conditional.</li> </ul>
Additional	Gaming machines	<p><b>Gaming Machine Act 2004 (152)</b></p> <ul style="list-style-type: none"> <li>(1) A licensee commits an offence if the licensee displays an external sign advertising gaming machines or promoting a gambling activity on the licensee's authorised premises.</li> </ul> <p>advertising, a gaming machine, includes having an image of, or text mentioning, a gaming machine on a sign advertising or promoting an activity, whether or not the activity is related to a gambling activity.</p> <p>external sign, for authorised premises, means a sign that can be seen from outside the authorised premises, but does not include:</p> <ul style="list-style-type: none"> <li>(a) an advertisement on television (other than closed-circuit television) or on the internet; or</li> <li>(b) a sign consisting mainly of a registered business name; or</li> <li>(c) a sign consisting mainly of a business logo that does not advertise gaming machines or promote a gambling activity.</li> </ul> <p>152A External visibility of gaming machines</p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	ACT Controls
		(1) A licensee commits an offence if a gaming machine, or any peripheral equipment for a gaming machine
Additional	Terrestrial wagering Online wagering	<b>Totalisator Act 2014 (55)</b> (1) A person commits an offence if: (a) the person publishes, or causes to be published, an advertisement that is directly related to the conduct of a totalisator; and (b) the advertisement contravenes the code of practice.
Additional	Terrestrial wagering	<b>Race and Sports Bookmaking Regulation 2001 (8)</b> A race bookmaker engaging in race bookmaking must not supply by telephone information about betting fluctuations of the Bookmakers Pricing Service.
Additional	All gambling activities	<b>ACT Code of Practice (1.23AA)</b> (1) A licensee of a gambling facility must not knowingly pay winnings to a person who: (a) has been excluded from gambling under section 1.14 (Exclusion of people at risk or excluded under deed); or
Additional	Gaming machines	<b>ACT Code of Practice (1.30)</b> (3) A gaming machine licensee must not: (a) conduct a promotion or offer an inducement that encourages people to increase their intensity of betting at the facility

## New South Wales

Table 54: NSW - Key Differences with Tasmanian Code

Tasmanian Code Section	Tasmanian Code Gambling Activity	NSW Controls
1.1 – 1.18	Gaming machines	<b>Gaming Machines Regulation 2019 (43)</b> (1) A person (whether or not a hotelier or club) must not publish or cause to be published any gaming machine advertising. <b>Casino Control Act 1992 (70A)</b> (1) It is condition of a casino licence that the casino operator must not publish any advertisement relating to gaming machines or cause or permit any such advertisement to be published.
1.10	Table gaming Terrestrial wagering Online wagering	<b>Casino Control Regulation 2019 (27)</b> (1) A person must not publish or communicate, or cause to be published or communicated, any casino advertising: (b) that includes children

Tasmanian Code Section	Tasmanian Code Gambling Activity	NSW Controls
	Lotteries	<p><b>Betting and Racing Act 1998 (33H)</b></p> <p>(2) A gambling advertisement must not:</p> <p>(b) depict children gambling</p> <p><b>Totalizator Act 1997 (80)</b></p> <p>(2) A totalizator advertisement must not:</p> <p>(b) depict children gambling</p>
1.17	Terrestrial wagering Online wagering	<p><b>Betting and Racing Act 1998 (33I)</b></p> <p>(2) A person must not publish a gambling advertisement in relation to a sporting fixture during the sporting fixture including during any breaks in the sporting fixture.</p> <p><b>Totalizator Act 1997 (80A)</b></p> <p>(2) A person must not publish any totalizator advertisement in relation to a sporting fixture during the sporting fixture including during any breaks in the sporting fixture.</p>
1.19 – 1.20	Gaming machines	<p><b>Gaming Machines Regulation 2019 (43)</b></p> <p>(1) A person (whether or not a hotelier or club) must not publish or cause to be published any gaming machine advertising.</p> <p><b>Casino Control Act 1992 (70A)</b></p> <p>(1) It is condition of a casino licence that the casino operator must not publish any advertisement relating to gaming machines or cause or permit any such advertisement to be published.</p>
2.3	Gaming machines	<p><b>Gaming Machines Regulation 2019 (47)</b></p> <p>A hotelier or registered club must not:</p> <p>(b) offer, or cause or permit to be offered, free credits to players, or as an inducement to persons to become players, of approved gaming machines in the hotel or on the club premises.</p> <p><b>Casino Control Regulation 2019 (15)</b></p> <p>A casino operator must not:</p> <p>(b) offer, or cause or permit the offer of, free credits to players or as an inducement to persons to become players of gaming machines in the casino</p>
2.5	Table gaming	<p><b>Casino Control Regulation 2019 (15)</b></p> <p>A casino operator must not:</p> <p>(a) offer or supply, or cause or permit the offer or supply of, free or discounted liquor as an inducement to participate, or to participate frequently, in a gambling activity in the casino</p>
2.8	Gaming machines	<p><b>Gaming Machines Regulation 2019 (13)</b></p> <p>For the purposes of section 61(4) of the Act:</p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	NSW Controls
		(b) \$500,000 is prescribed as the maximum amount of any prize that may be won from playing a multi-terminal gaming machine.
3.3	Terrestrial wagering Online wagering	<b>Betting and Racing Act 1998 (33HA)</b> (4) A person is taken to have withdrawn consent to receive all gambling advertisements from or on behalf of the provider if the person has not logged into the person's betting account for a period of 12 months.
4.6	Gaming machines Table gaming	<b>Gaming Machines Act 2001 (47A)</b> (1) A person (other than a financial institution) must not accept the transfer of a cheque that the person knows, or could reasonably be expected to know, is a prize winning cheque. <b>Casino Control Act 1992 (75)</b> (2) A person may establish with a casino operator a deposit account to which is to be credited the amount of any deposit to the account comprising: (a) money, or (b) a cheque payable to the operator, or (c) a traveller's cheque. <b>Casino Control Regulation 2019 (24)</b> (1) A person (other than a bank or authorised deposit-taking institution) must not accept the transfer of a cheque that the person knows, or could reasonably be expected to know, is a prize winning cheque.
4.7	Gaming machines	<b>Gaming Machines Regulation 2019 (25)</b> (1) If a hotelier or registered club is authorised to keep approved gaming machines, the hotelier or club must not: (a) exchange a cheque for cash unless the cheque is made out to: (i) the hotelier or the hotel owner, or (ii) the club, or (b) exchange a cheque for more than \$400 in cash, or (c) exchange more than one cheque for the same person on a single day for cash, or (d) exchange a cheque for cash if a cheque previously exchanged for the person who tendered the cheque has not been met on presentation (unless the amount of the cheque not met was subsequently paid to the hotelier or club).
5.1	Gaming machines	<b>Gaming Machines Regulation 2019 (26)</b> (1) A hotelier or registered club must pay so much of the total prize money payable to a person as exceeds \$5,000: (a) by means of a crossed cheque payable to the person, or



Tasmanian Code Section	Tasmanian Code Gambling Activity	NSW Controls
		(b) if the person so requests, by means of electronic funds transfer (if those means are available to the hotelier or club) to an account nominated by the person.
5.2	Table gaming Lotteries	<p><b>Casino Control Regulation 2019 (23)</b></p> <p>If the total prize money payable to a person exceeds \$2,000, the casino operator must:</p> <p>(a) notify the person, verbally or by the use of signs or other similar means, that the person may request the total prize money (or part of it) be paid by means of crossed cheque, and</p> <p>(b) if the person makes any such request, pay the amount requested by means of a crossed cheque payable to the person.</p> <p><b>Community Gaming Act 2018 (43)</b></p> <p>That part of a monetary prize for a gaming activity that exceeds \$5,000 must be paid:</p> <p>(a) if the prize winner so requests: by electronic funds transfer to an account nominated by the prize winner, or</p> <p>(b) in any other case: in a manner (other than in cash) that is agreed between the prize winner and the person paying the prize.</p>
9.3	Gaming machines	<p><b>Gaming Machines Regulation 2019 (8)</b></p> <p>(f) the gaming room must at all times be supervised by the hotelier or an employee of the hotelier by way of electronic means or physical presence, or both</p>
9.4	Gaming machines	<p><b>Gaming Machines Regulation 2019 (57)</b></p> <p>(1) The Authority is to refuse any application by a hotelier or registered club under section 57 of the Act:</p> <p>(a) to keep an approved gaming machine, or</p> <p>(b) to vary an existing authorisation to keep an approved gaming machine,</p> <p>unless the Authority is satisfied that the hotelier or the secretary of the club holds a recognised competency card with a current RCG endorsement.</p>
10.2	Gaming machines Table gaming	<p><b>Gaming Machines Regulation 2019 (46)</b></p> <p>(1) A hotelier or registered club must display gambling contact cards in a card holder that is securely attached to each bank of approved gaming machines and that is positioned so as to enable a person to clearly see the gambling contact cards:</p> <p>(a) while playing a gaming machine that is part of the bank of gaming machines, or</p> <p>(b) when approaching the bank of gaming machines.</p> <p><b>Gaming Machines Regulation 2019 (22)</b></p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	NSW Controls
		<p>(1) A hotelier or registered club must, in accordance with this clause, display a notice containing a warning about gambling and advice for getting help with problem gambling on each approved gaming machine kept in the hotel or on the club premises.</p> <p>(2) The notice must:</p> <ul style="list-style-type: none"> <li>(a) be positioned in a way so as to enable a person to clearly see the notice while playing the gaming machine, and</li> <li>(b) be attached to the gaming machine or consist of a permanently visible light emitting display that forms part of the gaming machine, and</li> <li>(c) be in a form approved by the Secretary and published on a website maintained by Liquor &amp; Gaming NSW.</li> </ul> <p><b>Casino Control Regulation 2019 (16)</b></p> <p>A casino operator must display, in accordance with this clause, a notice providing information about the chances of winning a major prize from the use or operation of gaming machines in the casino.</p> <p><b>Casino Control Regulation 2019 (20)</b></p> <p>A casino operator must, in accordance with this clause, display a notice containing a warning about gambling and advice for getting help with problem gambling on each gaming machine kept in the casino.</p>
Additional	Table gaming	<p><b>Casino Control Regulation 2019 (29)</b></p> <p>(1) A casino operator must not display or cause to be displayed any gambling-related sign unless the sign is located in a casino.</p> <p>(2) A casino operator must not enter into or extend the duration of any contract or arrangement for displaying a gambling-related sign that is displayed in contravention of subclause (1).</p> <p>(3) In this clause:</p> <p>gambling-related sign means any sign (whether consisting of words, symbols, pictures or any other thing) that draws attention to, or can reasonably be taken to draw attention to, the availability of gaming machines in a casino, but does not include any sign relating to the conduct of a totalizator under the Totalizator Act 1997 or of a public lottery under the Public Lotteries Act 1996.</p>
Additional	Terrestrial wagering Online wagering	<p><b>Betting and Racing Act 1998 (29)</b></p> <p>(1) A person must not publish, or cause to be published, any betting information.</p>
Additional	Table gaming	<p><b>Casino Control Act 1992 (70)</b></p> <p>(g) a person who is at or in the vicinity of the casino and is an agent of the casino operator or a casino employee must not</p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	NSW Controls
		induce persons outside the casino to enter the casino or take part in gaming in the casino
Additional	Terrestrial wagering Online wagering	<p><b>Betting and Racing Act 1998 (30)</b></p> <p>(1) A person must not publish, or cause to be published, an advertisement:</p> <ul style="list-style-type: none"> <li>(a) indicating that the person (or any other person) is prepared: <ul style="list-style-type: none"> <li>(i) to provide betting information, or</li> <li>(ii) to bet on any race that is to be held at a race meeting, or</li> <li>(iii) to bet on any declared betting event, or</li> </ul> </li> <li>(b) that is designed to induce a person to obtain betting information, or</li> <li>(c) that invites any person to make, or take a share in, a bet on any race or declared betting event, or</li> <li>(d) that relates to any gambling operations or services carried on by a person who is not a licensed bookmaker.</li> </ul>
Additional	Gaming machines	<p><b>Gaming Machines Act 2001 (45)</b></p> <p>(2) A hotelier or club must not:</p> <ul style="list-style-type: none"> <li>(a) offer or present or cause or permit to be offered or presented a promotional prize in the form of cash, or</li> <li>(b) offer or present or cause or permit to be offered or presented a promotional prize that exceeds \$1,000 in value, or</li> <li>(b1) offer or provide, or cause or permit to be offered or provided, a promotional prize (including a free give away) that is indecent or offensive, or</li> <li>(c) permit a patron of the hotel or the premises of the club to exchange a promotional prize for cash, or</li> <li>(d) permit any bonus or reward points accumulated under a player reward scheme to be redeemed for cash.</li> </ul>

## Northern Territory

Table 55: Northern Territory - Key Differences with Tasmanian Code

Tasmanian Code Section	Tasmanian Code Gambling Activity	NT Controls
1.14	All gambling activities	<p><b>Code of Practice for Responsible Gambling 2016</b></p> <p>4.6 Correspondence or Promotional Material - all gambling providers are not to send correspondence or promotional material to gambling customers who are excluded from their</p>

Tasmanian Code Section	Tasmanian Code Gambling Activity	NT Controls
		services or who request that this information not be sent to them.
1.16	Gaming machines Table gaming Keno Terrestrial wagering	<b>Code of Practice for Responsible Gambling 2016</b> 8.7 Notices of Winnings Paid - Advertising of individuals' winnings paid should only be displayed within the gambling provider's premises and not externally in public spaces. Personal particulars of winners are only to be published with their consent
1.16	Lotteries	<b>Gaming Control Act 1993 (36)</b> A person shall not: (e) print, publish or distribute or cause to be printed, published or distributed or have in his or her possession for publication or distribution: (ii) a list, whether complete or not, of prize winners or winning tickets in; or
4.1	Gaming machines Table gaming Keno Terrestrial wagering	<b>Code of Practice for Responsible Gambling 2016</b> 7.2 Location - ATMs must not be located within designated gaming areas and where safe and practicable, not in the entry to gaming areas. They must not be located within sight of the gaming areas.
4.1	Lotteries	<b>Code of Practice for Responsible Gambling 2016</b> 7.2 Location - ATMs must not be located within designated gaming areas and, where safe and practicable, not in the entry to gaming areas. They must not be located within sight of the gaming areas.
4.3	Lotteries	<b>Code of Practice for Responsible Gambling 2016</b> 7.3 ATM and EFTPOS Facilities will have access only to debit accounts; access to credit accounts will not be permitted.
4.4	Lotteries	<b>Code of Practice for Responsible Gambling 2016</b> All gambling providers are to make available information that will allow their patrons to make informed decisions about their gambling habits. The information to be displayed includes: 1.2 Information relating to the potential risks associated with gambling must be displayed prominently as well as information about where patrons can seek assistance with any gambling issues they may have. The information is to be displayed in all gambling areas plus those locations where an ATM or EFTPOS machine is available. <b>Code of Practice for Responsible Gambling 2016</b> 7.1 Signage - ATMs will carry or have within close sight of them problem gambling warning signage and appropriate support service contact details in a manner clearly visible to customers.



Tasmanian Code Section	Tasmanian Code Gambling Activity	NT Controls
4.6	Lotteries	<p><b>Code of Practice for Responsible Gambling 2016</b></p> <p>7.5 Cashing of Cheques, whether personal or third party, on the gambling provider's licensed premises for the sole purpose of gambling is forbidden.</p>
4.9	Online wagering	<p><b>Code of Practice for Responsible Gambling 2016</b></p> <p>7.1 Online gambling operators must ensure deposit transfers are to be carried out on a webpage separate from the gambling pages.</p>
5.2	Terrestrial wagering Lotteries	<p><b>Code of Practice for Responsible Gambling 2016</b></p> <p>7.6 Payment of winnings - all gambling providers are to pay by cheque winnings in excess of \$500 or where offered, electronic transfer. Cheques provided for gambling winnings should not be cashed within 24 hours of the win.</p>
6.1	Gaming machines Table gaming	<p><b>Code of Practice for Responsible Gambling 2016</b></p> <p>5.1 Passage of Time - Gambling providers will implement practices to ensure that customers are made aware of the passage of time - e.g.: clearly visible clocks in the vicinity of cash cages, automatic teller machines and coin dispensers, together with natural lighting where possible. Where gaming machines incorporate a clock, it must display the correct time.</p>
6.1	Lotteries	<p><b>Code of Practice for Responsible Gambling 2016</b></p> <p>5.1 Passage of Time - Gambling providers will implement practices to ensure that customers are made aware of the passage of time - e.g.: clearly visible clocks in the vicinity of cash cages, automatic teller machines and coin dispensers, together with natural lighting where possible. Where gaming machines incorporate a clock, it must display the correct time.</p>
7.3	Online wagering	<p><b>Code of Practice for Responsible Online Gambling 2019</b></p> <p>5.4 Online gambling operators are to take all reasonable steps to refuse a client and prevent a client from gambling if suspected of being drunk or under the influence of other drugs.</p>
8.2	Lotteries	<p><b>Code of Practice for Responsible Gambling 2016</b></p> <p>5.1 Passage of Time - Gambling providers will implement practices to ensure that customers are made aware of the passage of time - e.g.: clearly visible clocks in the vicinity of cash cages, automatic teller machines and coin dispensers, together with natural lighting where possible. Where gaming machines incorporate a clock, it must display the correct time.</p>
10.4	Gaming machines Table gaming	<p><b>Code of Practice for Responsible Gambling 2016</b></p>

Tasmanian Code Section	Tasmanian Code Gambling Activity	NT Controls
	Keno Terrestrial wagering Lotteries	All gambling providers are to make available information that will allow their patrons to make informed decisions about their gambling habits. The information to be displayed includes:  1.3 Meaningful and accurate information regarding the odds or win rates of major prizes should be clearly displayed in all gambling areas and providers who utilise websites must ensure this information is easily accessible by patrons.
Additional	Gaming machines Table gaming Keno Terrestrial wagering Lotteries	<b>Code of Practice for Responsible Gambling 2016</b>  5.3 Child Care Facilities - Where gambling providers offer childcare facilities, these facilities must recognise all childcare legislation and staff overseeing the facility must be appropriately accredited. The facility should be set up so that children cannot see gambling activities taking place.
Additional	Gaming machines	<b>Code of Practice for Responsible Gambling 2016</b>  6.2 Activities for Minors - Activities run by gambling providers for minors must not promote any aspect of gambling and should not be conducted in close proximity to gambling activities.
Additional	Lotteries	<b>Gaming Control (Community Gaming) Regulations 2006 (5)</b>  (2) An approved association conducting an attendance or membership lottery must not offer a prize of an amount exceeding \$10 000.
Additional	Lotteries	<b>Gaming Control (Community Gaming) Regulations 2006 (7)</b>  (2) An approved association conducting mini-lotto or a tipping competition must not offer prizes exceeding a total of \$5 000 in value.
Additional	Gaming machines Table gaming Keno Terrestrial wagering Lotteries	<b>Code of Practice for Responsible Gambling 2016</b>  2.2 Community Liaison Officer Role - Commercial gambling providers must appoint a person to: <ul style="list-style-type: none"> <li>• be available during approved gaming opening hours</li> <li>• provide appropriate information and assistance to patrons with gambling related problems</li> <li>• support other staff in providing assistance to these affected patrons</li> <li>• provide assistance to any staff that may themselves have gambling related issues.</li> </ul>
Additional	Online wagering	<b>Code of Practice for Responsible Online Gambling 2019</b>  2.1 Online gambling operators must have an appropriate level of management available to: <ul style="list-style-type: none"> <li>• assist staff and clients during those hours where staff are available to speak to clients</li> <li>• provide appropriate information and assistance to clients with gambling related problems</li> </ul>



Tasmanian Code Section	Tasmanian Code Gambling Activity	NT Controls
		<ul style="list-style-type: none"> <li>• support staff in providing assistance to these affected clients</li> <li>• provide confidential assistance to any staff who themselves may have gambling related issues</li> <li>• establish policies and procedures that allow customers to take steps to limit their gambling if desired</li> <li>• have available, for clients and staff, details of appropriate gambling support services.</li> </ul>
Additional	Gaming machines	<p><b>Code of Practice for Responsible Gambling 2016</b></p> <p>9. Participation in Gambling Research and Evaluation</p> <ul style="list-style-type: none"> <li>• All commercial gambling venues have a social responsibility to participate in research and evaluation activities associated with gambling. Gambling Service Providers are encouraged to participate in all gambling research projects endorsed by the Director General of Licensing.</li> </ul>

## Queensland

Table 56: Qld - Key Differences with Tasmanian Code

Tasmanian Code Section	Tasmanian Code Gambling Activity	Qld Controls
1.10	All gambling activities	<p><b>Qld Responsible Gambling Code of Practice – Hotel/Club/Casino/TAB/Racing/Keno/Lotteries Resource Manuals</b></p> <p>6.8 Strategies will ensure that any advertising or promotion is not implicitly or explicitly directed at minors or vulnerable or disadvantaged groups</p>
2.3	Gaming machines Lotteries	<p><b>Qld Responsible Gambling Code of Practice – Hotel Resource Manual</b></p> <p>6.10 Strategies will ensure that any advertising or promotion does not involve any irresponsible trading practices by the gambling provider.</p> <p><b>Unacceptable practices</b></p> <p>Irresponsible inducement linked to an advertisement, e.g. '\$5 worth of free coins redeemable only in the gaming room'.</p> <p><b>Qld Responsible Gambling Code of Practice – Club Resource Manual</b></p> <p>6.10 Strategies will ensure that any advertising or promotion does not involve any irresponsible trading practices by the gambling provider.</p>

Tasmanian Code Section	Tasmanian Code Gambling Activity	Qld Controls
		<p><b>Compliance actions</b></p> <p>Ensure gambling advertising and promotions, including player loyalty/rewards programs, if applicable, do not contain messages designed to persuade patrons to gamble in an excessive and irresponsible manner (who in the absence of such encouragement would not have otherwise) such as:</p> <ul style="list-style-type: none"> <li>not offering free money or credit for the purposes of gambling</li> <li>not offering inducements that would result in a substantial alteration to the person's normal betting stake or activity.</li> </ul> <p><b>Qld Responsible Gambling Code of Practice – Lotteries Resource Manual</b></p> <p>6.10 Strategies will ensure that any advertising or promotion does not involve any irresponsible trading practices by the gambling provider.</p> <p><b>Unacceptable practices</b></p> <p>Advertising an offer of free money or a loan for the purposes of gambling.</p> <p>Trade practices or inducements which intentionally aim to encourage people to gamble in an excessive or irresponsible manner.</p>
2.6	Gaming Machines	<p><b>Qld Responsible Gambling Code of Practice – Hotel Resource Manual</b></p> <p>6.10 Strategies will ensure that any advertising or promotion does not involve any irresponsible trading practices by the gambling provider.</p> <p><b>Unacceptable practices</b></p> <p>A rewards system that encourages irresponsible play to receive a reward or entry into an additional prize draw. For example:</p> <ul style="list-style-type: none"> <li>'The privileges of membership...Join today and win more often'.</li> <li>'The more you bet the more you win'.</li> </ul> <p>Prizes or gifts directly linked to winning a particular game, promotions conditional to a person gambling or offers of free credit to customers or potential customers.</p> <p><b>Qld Responsible Gambling Code of Practice – Club Resource Manual</b></p> <p>6.10 Strategies will ensure that any advertising or promotion does not involve any irresponsible trading practices by the gambling provider.</p> <p><b>Compliance actions</b></p> <p>Ensure gambling advertising and promotions, including player loyalty/rewards programs, if applicable, do not contain messages designed to persuade patrons to gamble in an excessive and irresponsible manner (who in the absence of such encouragement would not have otherwise) such as:</p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	Qld Controls
		<ul style="list-style-type: none"> <li>not offering a player loyalty/rewards program that encourages irresponsible play to receive a reward or entry into an additional prize draw, e.g. 'Join today and win more often'</li> </ul>
2.6	Lotteries	<p><b>Qld Responsible Gambling Code of Practice – Lotteries Resource Manuals</b></p> <p>6.10 Strategies will ensure that any advertising or promotion does not involve any irresponsible trading practices by the gambling provider.</p> <p><b>Unacceptable practices</b></p> <p>Any rewards system that encourages irresponsible play in order to receive a reward or entry into an additional prize draw. For example, spend \$300 to receive one entry into a promotional draw.</p>
3.5	Gaming machines	<p><b>Qld Responsible Gambling Code of Practice – Hotel Resource Manual</b></p> <p>1.2 Available on request</p> <p>Information is displayed in a prominent location to alert customers that the following information is available on request:</p> <ul style="list-style-type: none"> <li>the gambling provider's Responsible gambling policy document including policies for addressing problem gambling issues relevant to the local community</li> <li>the nature of games, game rules, odds or returns to players</li> <li>exclusion provisions</li> <li>gambling-related complaint handling procedures</li> <li>key elements of the gambling provider's financial transaction practices.</li> </ul>
3.11	Gaming machines Terrestrial wagering Online wagering	<p><b>Qld Responsible Gambling Code of Practice – Hotel/TAB Resource Manual</b></p> <p>3.1 Exclusion procedures</p> <p>Gambling providers to provide exclusion procedures and supporting documentation.</p>
3.13	Gaming machines Lotteries	<p><b>Qld Responsible Gambling Code of Practice – Hotel Resource Manual</b></p> <p>6.10 Strategies will ensure that any advertising or promotion does not involve any irresponsible trading practices by the gambling provider.</p> <p><b>Unacceptable practices</b></p> <p>Irresponsible inducement linked to an advertisement, e.g. '\$5 worth of free coins redeemable only in the gaming room'.</p> <p>A rewards system that encourages irresponsible play to receive a reward or entry into an additional prize draw. For example:</p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	Qld Controls
		<ul style="list-style-type: none"> <li>• ‘The privileges of membership...Join today and win more often’.</li> <li>• ‘The more you bet the more you win’.</li> </ul> <p>Prizes or gifts directly linked to winning a particular game, promotions conditional to a person gambling or offers of free credit to customers or potential customers.</p> <p><b>Qld Responsible Gambling Code of Practice – Club Resource Manual</b></p> <p>6.10 Strategies will ensure that any advertising or promotion does not involve any irresponsible trading practices by the gambling provider.</p> <p><b>Compliance actions</b></p> <p>Ensure gambling advertising and promotions, including player loyalty/rewards programs, if applicable, do not contain messages designed to persuade patrons to gamble in an excessive and irresponsible manner (who in the absence of such encouragement would not have otherwise) such as:</p> <ul style="list-style-type: none"> <li>• not offering free money or credit for the purposes of gambling</li> <li>• not offering inducements that would result in a substantial alteration to the person’s normal betting stake or activity</li> <li>• not offering a player loyalty/rewards program that encourages irresponsible play to receive a reward or entry into an additional prize draw, e.g. ‘Join today and win more often’</li> </ul> <p><b>Qld Responsible Gambling Code of Practice – Lotteries Resource Manuals</b></p> <p>6.10 Strategies will ensure that any advertising or promotion does not involve any irresponsible trading practices by the gambling provider.</p> <p><b>Unacceptable practices</b></p> <p>Advertising an offer of free money or a loan for the purposes of gambling.</p> <p>Trade practices or inducements which intentionally aim to encourage people to gamble in an excessive or irresponsible manner.</p> <p>Any rewards system that encourages irresponsible play in order to receive a reward or entry into an additional prize draw. For example, spend \$300 to receive one entry into a promotional draw.</p>
4.6	Gaming machines Table gaming Keno Terrestrial wagering	<p><b>Casino Control Act 1982</b></p> <p><b>68 Exchange by casino operator of chip purchase voucher for cheque</b></p> <p>(1) Subject to subsection (2), a casino operator may issue to a person for the purpose of gaming by the person and in exchange for a cheque from the person a chip purchase</p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	Qld Controls
		<p>voucher or chip purchase vouchers of a value equal to the amount of the cheque.</p> <p><b>69 Redemption of cheques</b></p> <p>Subject to section 71, a person who has deposited or lodged with a casino operator under section 67 or 68 a cheque that complies with the requirements referred to in section 67(2) in relation to that section may, with the agreement of the casino operator, redeem the cheque by presenting to the casino operator in exchange therefor—</p> <ul style="list-style-type: none"> <li>(a) cash; or</li> <li>(b) a cheque or cheques complying with requirements as aforesaid; or</li> <li>(c) a chip purchase voucher or chip purchase vouchers; or</li> <li>(d) chips; or</li> <li>(e) any 2 or more of the foregoing in combination;</li> </ul> <p>to an amount or a value equivalent to the amount of the cheque so deposited or lodged as aforesaid.</p> <p><b>70 Depositing of cheques</b></p> <p>All cheques received by a casino operator in respect of gaming that are not redeemed in accordance with section 69 shall be banked by the operator within the prescribed time.</p>
4.6 - 4.7	Gaming machines Table gaming Keno Terrestrial wagering	<p><b>Qld Responsible Gambling Code of Practice</b></p> <p>5.2 The following cheques can be cashed only by prior arrangement:</p> <ul style="list-style-type: none"> <li>• cheques not made payable to the venue</li> <li>• cheques not made payable to the person presenting the cheque</li> <li>• multiple cheques</li> </ul>
4.6 – 4.7	Lotteries	<p><b>Qld Responsible Gambling Code of Practice</b></p> <p>5.2 The following cheques can be cashed only by prior arrangement:</p> <ul style="list-style-type: none"> <li>• cheques not made payable to the venue</li> <li>• cheques not made payable to the person presenting the cheque</li> <li>• multiple cheques</li> </ul>
4.9	Lotteries	<p><b>Lotteries Regulations 2007 (17AH)</b></p> <p>(1) A lottery operator must not allow the total amount of funds deposited by a restricted player to the player's player account to be more than:</p> <ul style="list-style-type: none"> <li>(a) \$1000; or</li> <li>(b) if an amount less than \$1000 (an approved amount) is stated in the lottery operator's control system as the maximum amount of funds that may be deposited to a</li> </ul>



Tasmanian Code Section	Tasmanian Code Gambling Activity	Qld Controls
		<p>restricted player's player account — the approved amount.</p> <p>(2) A lottery operator must not allow a person to deposit funds (a deposit amount) to the person's player account if the balance of the account, including the deposit amount, would be more than the authorised limit for the account.</p>
5.1	Table gaming Terrestrial wagering Online wagering Lotteries	<p><b>Qld Responsible Gambling Code of Practice</b></p> <p>5.2 Gambling providers are to establish a limit above which all winnings are paid by cheque or electronic transfer</p>
5.2	Lotteries	<p><b>Qld Responsible Gambling Code of Practice</b></p> <p>5.2 Gambling winnings above the set limit are paid by cheque and are not cashed on the gambling provider's premises until the next trading day or within 24 hours of the win</p>
7.2	Table gaming Keno Terrestrial wagering	<p><b>Casino Control Act 1982 (65C)</b></p> <p>A casino operator must not sell, give or distribute liquor to a person at a gaming table, or at another playing area within a casino, unless the chief executive has approved the sale, giving or distribution at the table or other area.</p>
8.2	Gaming machines Table gaming Keno Terrestrial wagering	<p><b>Qld Responsible Gambling Code of Practice</b></p> <p>4.7 Gambling providers implement practices to ensure that customers are made aware of the passage of time</p>
8.2	Online wagering	<p><b>Qld Responsible Gambling Code of Practice</b></p> <p>4.7 Gambling providers implement practices to ensure that customers are made aware of the passage of time</p>
10.1 (c)	Lotteries	<p><b>Qld Responsible Gambling Code of Practice</b></p> <p>1 Provision of information</p> <p>1.2 Information is displayed in a prominent location to alert customers that the following information is available on request:</p> <ul style="list-style-type: none"> <li>• exclusion provisions</li> </ul> <p>3 Exclusion provisions (self-exclusions and venue-initiated exclusions for problem gambling)</p> <p>3.1 Gambling providers to provide exclusion procedures and supporting documentation</p> <p>3.3 Excluded customers are to be given support in seeking consensual exclusions from other gambling providers, where practicable</p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	Qld Controls
Additional	Gaming machines Table gaming Keno Terrestrial wagering Online wagering	<b>Qld Responsible Gambling Code of Practice</b> 6 Advertising and promotions 6.7 Does not focus exclusively on gambling, where there are other activities to promote
Additional	Gaming machines Table gaming Keno Terrestrial wagering Online wagering	<b>Qld Responsible Gambling Code of Practice</b> 6 Advertising and promotions 6.9 Does not involve any external signs advising of winnings paid
Additional	Gaming machines Table gaming Keno Terrestrial wagering	<b>Qld Responsible Gambling Code of Practice</b> 4 Physical environment 4.3 Provision of hospitality services in areas where gambling is provided is managed in such a way as to encourage customers to take breaks in play
Additional	Gaming machines Table gaming Keno Terrestrial wagering	<b>Qld Responsible Gambling Code of Practice</b> 4 Physical environment 4.5 Where child play areas are provided, best efforts should be made to minimise exposure to areas where gambling activities are conducted  Where gambling providers offer adjunct childcare, these facilities must provide safe and suitable standards of care in accordance with relevant childcare legislation
Additional	Gaming machines Table gaming Keno Terrestrial wagering Lotteries	<b>Qld Responsible Gambling Code of Practice</b> 4 Physical environment 4.8 Gambling providers implement practices to ensure that customers are discouraged from participating in extended, intensive and repetitive play
Additional	Gaming machines Table gaming Keno Terrestrial wagering Lotteries	<b>Qld Responsible Gambling Code of Practice</b> 2 Interaction with customers and community 2.1 To support early intervention and prevention strategies where opportunities arise, gambling providers are to establish effective mechanisms to link with: <ul style="list-style-type: none"> <li>• local gambling-related support services</li> <li>• community networks where responsible gambling-related issues could be raised</li> </ul>
Additional	Gaming machines Table gaming	<b>Qld Responsible Gambling Code of Practice</b> 2 Interaction with customers and community



Tasmanian Code Section	Tasmanian Code Gambling Activity	Qld Controls
	Keno Terrestrial wagering Online wagering Lotteries	<p>2.2 Gambling providers are to nominate a person/s to perform the customer liaison role and who is to:</p> <ul style="list-style-type: none"> <li>• provide appropriate information to assist customers with gambling-related problems</li> <li>• support staff in providing assistance to those customers</li> <li>• provide assistance to staff with gambling-related problems</li> <li>• develop linkages with local community groups where opportunities arise</li> </ul>
Additional	Lotteries	<p><b>Charitable and Non-Profit Gaming Regulations 1999 (13)</b></p> <p>An advertisement for a game must not state, suggest or imply that the game will be drawn under the supervision of:</p> <ol style="list-style-type: none"> <li>(a) the State; or</li> <li>(b) a representative of the State; or</li> <li>(c) a public service officer</li> </ol>
Additional	Gaming machines	<p><b>Gaming Machines Act 1991 (191)</b></p> <p>Certain persons must complete approved responsible service of gambling course</p> <p>(1) This section applies if the commissioner considers a person connected with, or who is an employee of, a licensee:</p> <ol style="list-style-type: none"> <li>(a) has the power to exercise a significant influence over the conduct of gaming by the licensee; or</li> <li>(b) because of: <ol style="list-style-type: none"> <li>(i) the person's remuneration or policymaking position; or</li> <li>(ii) any other criteria prescribed under a regulation;</li> </ol> </li> </ol> <p>exercises or is able to exercise authority of such a nature or to such an extent in respect of the conduct of gaming by the licensee as to make it desirable in the public interest that that person hold a current responsible service of gambling course certificate.</p> <p>(1A) The commissioner must, by written notice, require the person to complete an approved responsible service of gambling course, and obtain a current responsible service of gambling course certificate, within 3 months after the person receives the notice.</p>
Additional	Gaming machines	<p><b>Gaming Machines Regulations 2002 (9)</b></p> <p>The licensee must ensure that gaming does not dominate external signage on the licensee's licensed premises or marketing or promotional activity for the licensed premises.</p>
Additional	Keno	<b>Keno Act 1996 (148)</b>



Tasmanian Code Section	Tasmanian Code Gambling Activity	Qld Controls
		(3) An authorised keno operator must refuse to pay a prize for an approved keno game if the operator reasonably believes that the prize was obtained because of a contravention of subsection (1), (2) or (2A). (i.e. the winner was extended credit).

## South Australia

Table 57: SA - Key Differences with Tasmanian Code

Tasmanian Code Section	Tasmanian Code Gambling Activity	SA Controls
1.7	All gambling activities	<p><b>Gaming Machines Gambling Code of Practice (8)</b></p> <p>(1) Licensees must ensure that gambling advertising –</p> <ul style="list-style-type: none"> <li>(i) does not suggest that a player's skill can influence the outcome of gambling activity;</li> </ul> <p><b>Advertising Code of Practice (13)</b></p> <p>(3) Gambling advertising must not</p> <ul style="list-style-type: none"> <li>(a) in relation to non-skill gambling, suggest that a player's skill can influence the outcome of gambling activity; or</li> <li>(b) in relation to skill gambling, exaggerate the extent to which skill can influence the outcome of gambling activity.</li> </ul>
1.17	Lotteries	<p><b>Lottery and Gaming Regulations 2008 (45)</b></p> <p>(1) Subject to subregulation (2), an association which conducts a lottery that is a fundraiser must not advertise or promote the lottery:</p> <ul style="list-style-type: none"> <li>(a) on the radio on a weekday between the hours of 6.00 a.m. and 8.30 a.m.; or</li> <li>(b) on the television on a weekday between the hours of 4.00 p.m. and 7.30 p.m.</li> </ul> <p>(2) Subregulation (1) does not apply to a fundraiser lottery that is a major lottery.</p>
1.18	Gaming machines	<p><b>Gaming Machines Gambling Code of Practice (8)</b></p> <p>(1) Licensees must ensure that gambling advertising –</p> <ul style="list-style-type: none"> <li>(j) does not include sounds or images of: <ul style="list-style-type: none"> <li>(1) coins landing in the tray of a gaming machine;</li> <li>(2) banknotes being inserted into or dispensed from a gaming machine; or</li> <li>(3) tickets being printed or dispensed from a gaming machine;</li> </ul> </li> </ul> <p><b>Advertising Code of Practice (13)</b></p>

Tasmanian Code Section	Tasmanian Code Gambling Activity	SA Controls
		(4) Gambling advertising must not include the sounds of, or sounds suggestive of, coins landing in the tray of a gaming machine.
1.20	Gaming machines	<p><b>Gaming Machines Gambling Code of Practice (8)</b></p> <p>(2) For the purposes of this clause, a licensee will not be regarded as advertising when –</p> <p>(a) the licensee sends communication direct to a customer, and the customer has provided their express consent to receiving advertising material</p>
2.3	Gaming machines Table gaming Keno Terrestrial wagering Lotteries	<p><b>Responsible Gambling Code of Practice (54)</b></p> <p>(1) A gambling provider must not offer or provide any inducement</p> <p>(a) directed at encouraging patrons to gamble;</p> <p>(b) directed at encouraging people to open gambling accounts.</p> <p>(2) Sub clause (1)(a) does not apply to</p> <p>(a) the offering or provision of participation in an acceptable loyalty program;</p> <p>(b) the offering or provision of participation in an acceptable trade promotion lottery or of a complimentary gambling product;</p> <p>(c) the offering or provision in a gambling area of an inducement in the form of complimentary non-alcoholic beverages and refreshments of nominal value; or</p> <p>(d) the offering or provision of an inducement in respect of a pre commitment trial approved in writing by the Authority, within and subject to the terms of the instrument of approval.</p> <p>(3) This clause does not prevent the payment of commissions to, or in respect of, identified high value patrons.</p> <p><b>Gaming Machines Gambling Code of Practice (8)</b></p> <p>(1) Licensees must ensure that gambling advertising –</p> <p>(g) does not offer any credit, voucher or reward as an inducement to participate, or to participate frequently, in any gambling activity;</p> <p><b>Gaming Machines Gambling Code of Practice (24)</b></p> <p>An inducement includes any credit, voucher or reward offered to a person as an inducement to participate, or to participate frequently, in any gambling activity.</p> <p>(1) A licensee must not offer or provide any inducement directed at encouraging patrons to gamble.</p> <p>(2) Sub-clause (1) does not apply to –</p> <p>(a) the offering or provision of participation in an acceptable loyalty program (see clause 25);</p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	SA Controls
		<ul style="list-style-type: none"> <li>(b) the offering or provision of participation in an acceptable trade promotion lottery (see clause 26) by drawing attention to the prizes, or of the offering of a complimentary gambling product;</li> <li>(c) the offering or provision in a gaming area of complimentary non-alcoholic beverages and refreshments of nominal value.</li> </ul>
2.3	Online wagering	<p><b>Responsible Gambling Code of Practice (54)</b></p> <ul style="list-style-type: none"> <li>(1) A gambling provider must not offer or provide any inducement               <ul style="list-style-type: none"> <li>(a) directed at encouraging patrons to gamble;</li> <li>(b) directed at encouraging people to open gambling accounts.</li> </ul> </li> <li>(2) Sub clause (1)(a) does not apply to               <ul style="list-style-type: none"> <li>(a) the offering or provision of participation in an acceptable loyalty program;</li> <li>(b) the offering or provision of participation in an acceptable trade promotion lottery or of a complimentary gambling product;</li> <li>(c) the offering or provision in a gambling area of an inducement in the form of complimentary non-alcoholic beverages and refreshments of nominal value; or</li> <li>(d) the offering or provision of an inducement in respect of a pre commitment trial approved in writing by the Authority, within and subject to the terms of the instrument of approval.</li> </ul> </li> <li>(3) This clause does not prevent the payment of commissions to, or in respect of, identified high value patrons.</li> </ul>
2.4	Gaming machines Table gaming Keno Lotteries	<p><b>Responsible Gambling Code of Practice (54)</b></p> <ul style="list-style-type: none"> <li>(1) A gambling provider must not offer or provide any inducement               <ul style="list-style-type: none"> <li>(a) directed at encouraging patrons to gamble;</li> <li>(b) directed at encouraging people to open gambling accounts.</li> </ul> </li> <li>(2) Sub clause (1)(a) does not apply to               <ul style="list-style-type: none"> <li>(a) the offering or provision of participation in an acceptable loyalty program;</li> <li>(b) the offering or provision of participation in an acceptable trade promotion lottery or of a complimentary gambling product;</li> <li>(c) the offering or provision in a gambling area of an inducement in the form of complimentary non-alcoholic beverages and refreshments of nominal value; or</li> <li>(d) the offering or provision of an inducement in respect of a pre commitment trial approved in writing by the</li> </ul> </li> </ul>



Tasmanian Code Section	Tasmanian Code Gambling Activity	SA Controls
		<p>Authority, within and subject to the terms of the instrument of approval.</p> <p>(3) This clause does not prevent the payment of commissions to, or in respect of, identified high value patrons.</p>
2.5	Online wagering	<p><b>Responsible Gambling Code of Practice (51A)</b></p> <p>(1) A gambling provider must take all practicable steps</p> <p>(c) to ensure that liquor is not supplied to reward, promote or encourage continued gambling.</p>
2.6	Gaming machines Table gaming Keno	<p><b>Responsible Gambling Code of Practice (54)</b></p> <p>(1) A gambling provider must not offer or provide any inducement</p> <p>(a) directed at encouraging patrons to gamble;</p> <p>(b) directed at encouraging people to open gambling accounts.</p> <p>(2) Sub clause (1)(a) does not apply to</p> <p>(a) the offering or provision of participation in an acceptable loyalty program;</p> <p>(b) the offering or provision of participation in an acceptable trade promotion lottery or of a complimentary gambling product;</p> <p>(c) the offering or provision in a gambling area of an inducement in the form of complimentary non-alcoholic beverages and refreshments of nominal value; or</p> <p>(d) the offering or provision of an inducement in respect of a pre commitment trial approved in writing by the Authority, within and subject to the terms of the instrument of approval.</p> <p>(3) This clause does not prevent the payment of commissions to, or in respect of, identified high value patrons.</p>
2.6	Lotteries	<p><b>Responsible Gambling Code of Practice (54)</b></p> <p>(1) A gambling provider must not offer or provide any inducement</p> <p>(a) directed at encouraging patrons to gamble;</p> <p>(b) directed at encouraging people to open gambling accounts.</p> <p>(2) Sub clause (1)(a) does not apply to</p> <p>(a) the offering or provision of participation in an acceptable loyalty program;</p> <p>(b) the offering or provision of participation in an acceptable trade promotion lottery or of a complimentary gambling product;</p> <p>(c) the offering or provision in a gambling area of an inducement in the form of complimentary non-alcoholic beverages and refreshments of nominal value; or</p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	SA Controls
		<p>(d) the offering or provision of an inducement in respect of a pre commitment trial approved in writing by the Authority, within and subject to the terms of the instrument of approval.</p> <p>(3) This clause does not prevent the payment of commissions to, or in respect of, identified high value patrons.</p>
3.1	Lotteries	<p><b>Responsible Gambling Code of Practice (55)</b></p> <p>(1) A loyalty program is an acceptable loyalty program</p> <p>(iv) offers regular activity statements</p>
3.10	All gambling activities	<p><b>Responsible Gambling Code of Practice (55)</b></p> <p>(1) A loyalty program is an acceptable loyalty program</p> <p>(a) if it is a structured program which</p> <p>(iii) offers rewards proportionate to gambling activity (including non-monetary privileges attached to tiers in a stepped rewards system)</p>
4.8	Gaming machines	<p><b>Responsible Gambling Code of Practice (76)</b></p> <p>Unless a gaming machine licensee is party to a responsible gambling agreement</p> <p>(c) the licensee must ensure that patron activity on automated coin dispensing machines is routinely and regularly monitored</p> <p><b>Responsible Gambling Code of Practice (49)</b></p> <p>A gaming provider must ensure that coin can only be obtained from</p> <p>(a) a cashier; or</p> <p>(b) an automated coin dispensing machine which is located so as to enable patron activity to be monitored.</p>
5.1	Table gaming Terrestrial wagering	<p><b>Responsible Gambling Code of Practice (47A)</b></p> <p>(1) Subject to sub clause (2), a gaming provider must, if requested to provide a cheque on premises in respect of an undisputed prize, winnings or redemption of credits in aggregate of \$1 000 or more, provide the cheque</p> <p>(a) as soon as practicable; and</p> <p>(b) in any event, within 30 minutes after the patron makes the request and completes any formalities required by law.</p> <p>(2) The Authority must, if satisfied on application by a gaming provider that exceptional circumstances exist, fix a period longer than 30 minutes for the purposes of sub clause (1)(b).</p>
5.3	Table gaming Terrestrial wagering	<p><b>Gambling Administration Act 2019 (53)</b></p> <p>(1) A gambling provider may withhold winnings from a person if satisfied that the person is subject to a barring order under</p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	SA Controls
	Online wagering lotteries	<p>this Part, and in that event, must obtain the person's name and address and inform them of the right to have the decision reviewed.</p> <p><b>Responsible Gambling Code of Practice (58A)</b></p> <p>(1) If a gambling provider has established a gambling account for a person</p> <p>(2) Sub-clause (1) does not operate:</p> <p>(b) to preclude a gambling provider from implementing:</p> <p>(iii) procedures for the holding of a major prize pending identification of those entitled to claim the prize</p>
7.2	Gaming machines	<p><b>Gaming Machines Gambling Code of Practice (23)</b></p> <p>(2) The licensee must ensure that a person is not served liquor while seated or standing at a gaming machine.</p>
7.2	Table gaming	<p><b>Responsible Gambling Code of Practice (51A)</b></p> <p>51A Alcohol and gambling</p> <p>(2) The casino licensee must ensure that a person is not served liquor while seated or standing at a gaming machine or at automated table game equipment, unless:</p> <p>(a) the machine or equipment is in a premium gaming area<sup>10</sup>; or</p> <p>(b) the automated table game is conducted by a dealer.</p> <p>(3) A gaming machine licensee must ensure that a person is not served liquor while seated or standing at a gaming machine.</p>
8.2	Online wagering Lotteries	<p><b>Responsible Gambling Code of Practice (50)</b></p> <p>(1) A gambling provider (other than a gaming provider) must</p> <p>(d) ensure that the time of day is:</p> <p>(i) prominently displayed; and</p> <p>(ii) visible:</p> <p>throughout gambling areas.</p>
Additional	All gambling activities	<p><b>Advertising Code of Practice (14)</b></p> <p>(1) A gambling provider must not include, in any gambling advertising, material which includes one or more of the following expressions (or anything analogous to them):</p> <p>(a) "win"; and</p> <p>(b) "\$":</p> <p>unless that expression is used in relation to:</p> <p>(c) a particular prize which has been determined or is payable; or</p> <p>(d) a reasonable approximation or estimate of a prize which can be won.</p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	SA Controls
		(2) For avoidance of any doubt, this clause applies to signs on the exterior of a gambling provider's premises or in their immediate environs.
Additional	Terrestrial wagering Online wagering	<p><b>Advertising Code of Practice (34)</b></p> <p>(1) The forms of gambling to which this Part applies are</p> <ul style="list-style-type: none"> <li>(a) betting on a contingency as to the outcome of an event;</li> <li>(b) betting on a contingency which is dependent on the holding of an event; and</li> <li>(c) betting on a contingency which is dependent on the outcomes of multiple related events or rounds of events (a "tournament").</li> </ul> <p>(2) For the purposes of this Part, gambling advertising encourages betting on a form of gambling if</p> <ul style="list-style-type: none"> <li>(a) it quotes a price; or</li> <li>(b) it draws attention to the time period in which the form of gambling is available; or</li> <li>(c) it draws attention in any way to the availability of the form of gambling; or</li> <li>(d) it otherwise encourages the betting regardless of whether that form of gambling is approved, or capable of being approved, for the gambling provider in South Australia.</li> </ul> <p>35 Live odds applicable times</p> <p>The times to which this Part applies are</p> <ul style="list-style-type: none"> <li>(a) in respect of an event which is completed in a single period of 24 hours any time after the commencement of the event;</li> <li>(b) in respect of an event which is scheduled to be completed over more than one period of 24 hours: <ul style="list-style-type: none"> <li>(i) if the relevant contingency relates to the actual outcome of the event — any time after the commencement of the event during the 24 hour period in which the event is scheduled to conclude; and</li> <li>(ii) if sub-paragraph (i) does not apply — any time between the commencement of the event in a particular period of 24 hours and the end of the event in that period; and</li> </ul> </li> <li>(c) in respect of a tournament the commencement of the related event or round of events (as the case requires) by or in which the relevant contingency will be determined.</li> </ul> <p>36 Regulation of live odds advertising</p> <p>Gambling advertising to which this Part applies may only be undertaken</p> <ul style="list-style-type: none"> <li>(a) in print media;</li> </ul>



Tasmanian Code Section	Tasmanian Code Gambling Activity	SA Controls
		<ul style="list-style-type: none"> <li>(b) on a public webpage;</li> <li>(c) by telephone voice call; or</li> <li>(d) in a gambling area.</li> </ul>
Additional	Gaming machines	<p><b>Advertising Code of Practice (37)</b></p> <p>Unless a gaming machine licensee is party to a responsible gambling agreement</p> <ul style="list-style-type: none"> <li>(a) the licensee must ensure that there is no advertising of its gambling product on the exterior of its premises or in their immediate environs;</li> <li>(b) the licensee must ensure that there is no advertising of its gambling product within its premises except for                             <ul style="list-style-type: none"> <li>(i) material in gambling areas within the premises; and</li> <li>(ii) directional signage in areas of the premises other than gambling areas; and</li> </ul> </li> <li>(c) its gambling advertising must not refer to factors that might induce a person to engage in gambling activity including, but not limited to, prizes or benefits other than those available on gaming machines.</li> </ul>
Additional	Keno Terrestrial wagering Lotteries	<p><b>Responsible Gambling Code of Practice (50A)</b></p> <p>If a gambling provider (other than a gaming provider) installs, in a place in which it is otherwise authorised to provide its gambling product, a device which allows customers to purchase the gambling product and process winnings without the assistance of an operator, the gambling provider must ensure that:</p> <ul style="list-style-type: none"> <li>(a) subject to paragraph (b), the device is configured to allow the gambling product to be purchased using a customer's gambling account; and</li> <li>(b) if the device is configured to allow the gambling product to be purchased other than by using a gambling account, enhanced responsible gambling measures approved by the Authority in respect of the device (or class of device) are being implemented; and</li> <li>(c) the device is not operated by the insertion of cash.</li> </ul>
Additional	Gaming machines	<p><b>Responsible Gambling Code of Practice (76)</b></p> <p>Unless a gaming machine licensee is party to a responsible gambling agreement</p> <ul style="list-style-type: none"> <li>(d) the licensee must not allow participation in a loyalty program other than one which includes a pre commitment program approved by the Authority</li> </ul>
Additional	Gaming machines	<p><b>Gaming Machines Gambling Code of Practice (8)</b></p> <ul style="list-style-type: none"> <li>(1) Licensees must ensure that gambling advertising –                             <ul style="list-style-type: none"> <li>(k) does not include the expressions “Win” or “\$”, unless these expressions specifically relate to a prize that has</li> </ul> </li> </ul>



Tasmanian Code Section	Tasmanian Code Gambling Activity	SA Controls
		been determined or is payable, or to an estimate of a prize which can be won.
Additional	Gaming machines	<p><b>Casino Act 1997 (42B)</b></p> <p>(5) It is a condition of the casino licence that the licensee must not permit the use of an audio device on any gaming machine if the use of the device is not intended primarily to assist a person with a hearing impairment</p>
Additional	Gaming machines	<p><b>Casino Act 1997 (42B)</b></p> <p>(6) It is a condition of the casino licence that the licensee must not provide any gaming machine or automated table game equipment that is fitted with a device or mechanism designed to allow the playing of a number of successive games by an automatic process.</p>
Additional	Gaming machines	<p><b>Casino Regulations 2013 (8)</b></p> <p>For the purposes of section 42B(1)(d) of the Act, it is a requirement that a gaming machine or automated table game equipment be operated in connection with a pre-commitment system that is operated by the licensee in compliance with the requirements of the Voluntary Pre-commitment Code set out in Schedule 2.</p>
Additional	Gaming machines	<p><b>Gaming Machines Act 1992 (53A)</b></p> <p>(4a) The holder of a gaming machine licence must not provide any gaming machine on the licensed premises that allows the operation of a game by insertion of a banknote if the cash value of the credit balance on the gaming machine is \$100 or more.</p> <p>(5) The holder of a gaming machine licence must not provide any gaming machine on the licensed premises that may be operated by the insertion of a banknote of a denomination greater than \$50.</p> <p>(6) The holder of a gaming machine licence must not permit the use of an audio device on any gaming machine on the licensed premises if the use of the device is not intended primarily to assist a person with a hearing impairment.</p> <p>(8) The holder of a gaming machine licence must not provide any gaming machine on the licensed premises that is fitted with a device or mechanism designed to allow the playing of successive games by an automatic process.</p>
Additional	Gaming machines	<p><b>Gaming Machines Act 1992 (53A)</b></p> <p>Under Regulation 26, for the purposes of section 53A(1)(d) of the Act, it is a requirement that a gaming machine (using an account based cashless gaming system) be operated in connection with a pre-commitment system operated by the licensee in compliance with the requirements of the Voluntary Pre-commitment Code set out in Schedule 3.</p>
Additional	Gaming machines	<p><b>Gaming Machines Act 1992 (53)</b></p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	SA Controls
		<p>The holder of a gaming machine licence must not cause, suffer or permit any gaming machine on the licensed premises:</p> <ul style="list-style-type: none"> <li>(a) to be fitted with linked jackpot equipment; or</li> <li>(b) to be linked in any manner that allows the winnings, or part of the winnings, from the machine to accumulate with the winnings, or part of the winnings, from any other gaming machine.</li> </ul>
Additional	Gaming machines Table gaming Keno Terrestrial wagering	<p><b>Responsible Gambling Code of Practice (45A)</b></p> <ul style="list-style-type: none"> <li>(b) when the ATM prints a transaction slip (however described), the transaction record includes the condensed warning message and the national gambling helpline number 1800 858 858.</li> </ul>
Additional	Gaming machines	<p><b>Gaming Machines Gambling Code of Practice (22)</b></p> <ul style="list-style-type: none"> <li>(1) A licensee must take all reasonable steps to ensure that a patron who displays signs of gambling harm is provided with the name and telephone number of a widely available gambling help service.</li> <li>(2) A licensee must –                             <ul style="list-style-type: none"> <li>(a) identify a gambling help service that their patrons and families can readily access (including the location of the help service and a key contact who can be asked for by name);</li> <li>(b) ensure that staff are sufficiently informed about the identity and location of the gambling help service so as to be able to direct patrons to the service; and</li> <li>(c) ensure that management level contact is established and maintained with the gambling help service about problem gambling matters.</li> </ul> </li> </ul>

## Victoria

Table 58: VIC - Key Differences with Tasmanian Code

Tasmanian Code Section	Tasmanian Code Gambling Activity	Vic Controls
1.6	Gaming machines	<p><b>Ministerial Direction – Responsible Gambling Codes for Venue Operators</b></p> <p>A venue operator must ensure that communications with customers do not:</p> <ul style="list-style-type: none"> <li>(a) induce a person to enter or remain in the gaming machine area;</li> <li>(b) induce gaming machine play (with the exception of communication that forms part of a lawful loyalty scheme)</li> </ul>
1.10	Terrestrial wagering	<b>Gambling Regulation Act 2003 (4.7.8)</b>

Tasmanian Code Section	Tasmanian Code Gambling Activity	Vic Controls
	Online wagering	A wagering service provider must not publish or disseminate, or cause to be published or disseminated, any gambling advertising, in any form or by any method of communication, that:  (b) depicts children wagering or involved in any other form of gambling
2.3	Gaming machines	<b>Gambling Regulation Act 2003 (3.5.33P)</b>  (1) A venue operator must not offer a non-cash gaming token as an inducement to gamble.  (2) A venue operator must not offer to increase the value of a non-cash gaming token as an inducement to gamble.  (3) A person must not induce, or attempt to induce, a person to choose to have winnings or accumulated credits paid out as or by way of a non-cash gaming token.
3.1	Gaming machines	<b>Gambling Regulation Act 2003 (3.5.36)</b>  (1) A venue operator must not allow a person to participate in a loyalty scheme at the approved venue unless:  (b) the person has agreed to receive player activity statements relating to the playing of games under the scheme.  <b>Gambling Regulation Act 2003 (3.5.37)</b>  (1) At least once each year, a loyalty scheme provider must provide each active participant with a player activity statement containing the prescribed information
3.7	Gaming machines	<b>Gambling Regulation Act 2003 (3.5.37)</b>  (4) If an active participant requests an additional copy of his or her player activity statement, the loyalty scheme provider must provide it to the active participant on payment of the fee (if any), not exceeding \$20, determined by the provider.  <b>Gambling Regulation Act 2003 (3.5.41)</b>  (1) A loyalty scheme provider must allow a person who is or was a participant in the scheme, on payment of the fee (if any), not exceeding \$20, determined by the provider, to have access to any information held by the provider relating to the person's participation in the scheme.
3.10	Gaming machines	<b>Gambling Regulation (Pre-commitment and Loyalty Scheme) Regulations 2014 (25)</b>  (1) A loyalty scheme provider who is not a venue operator or casino operator must not allow a person to participate in a loyalty scheme that awards more gaming points to a person than it would award non-gaming points to the person if the person spent the same amount on the purchase of goods or services not related to the playing of gaming machines as the amount bet by the person on gaming machines.
4.1	Gaming machines	<b>Gambling Regulation Act 2003 (3.5.33C)</b>

Tasmanian Code Section	Tasmanian Code Gambling Activity	Vic Controls
		<p>(2) The venue operator must not provide, or allow another person to provide on the venue operator's behalf, a cash facility in the approved venue other than:</p> <p>(a) an automatic teller machine:</p> <p>(i) for which the venue operator holds an approval under this Subdivision; and</p> <p>(ii) that is provided in accordance with the approval; or</p> <p>(b) an EFTPOS facility that complies with subsection (3).</p>
4.1	Table gaming Keno Terrestrial wagering	<p><b>Casino Control Act 1991 (81AAA)</b></p> <p>(1) In relation to a casino, a casino operator must not provide, or allow another person to provide on the casino operator's behalf, an automatic teller machine or an alternative cash access facility:</p> <p>(a) in the casino; or</p> <p>(b) in an area that is less than 50 metres walking distance away from an entrance to the casino.</p>
4.3	Gaming machines	<p><b>Gambling Regulation Act 2003 (3.5.33Q)</b></p> <p>A venue operator must not provide, or allow a person to provide, facilities by which a cash advance from a credit account can be used:</p> <p>(a) to obtain a non-cash gaming token; or</p> <p>(b) to increase the value of a non-cash gaming token.</p>
4.5	Gaming machines	<p><b>Gambling Regulation Act 2003 (3.5.33C)</b></p> <p>(3) An EFTPOS facility complies with this subsection if it does not allow a person to do any of the following by means of the facility:</p> <p>(a) obtain an amount of cash exceeding \$500 on any one debit or credit card within a 24 hour period;</p> <p>(b) obtain an amount of cash exceeding \$200 in any one transaction on any one debit or credit card;</p> <p>(c) obtain a cash advance from a credit account.</p>
5.1	Gaming machines	<p><b>Casino Control Act 1991 (81AAB)</b></p> <p>(1) A casino operator must not pay out, or allow another person to pay out, winnings or accumulated credits exceeding \$2000 from a gaming machine to a person except by cheque.</p>
5.1	Lotteries	<p><b>Gambling Regulation Act 2003 (8.4.7A)</b></p> <p>(1) If a person wins prize money of \$1000 or more in a bingo game, the bingo centre operator or a nominee of the community or charitable organisation who is conducting the bingo game must not pay out, or allow another person to pay out, any of that prize money except by cheque that is not payable to cash.</p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	Vic Controls
5.2	Gaming machines	<p><b>Gambling Regulation Act 2003 (3.5.33)</b></p> <p>(1) If a person has \$2000 or more worth of accumulated credits on a gaming machine, the venue operator or gaming operator must not pay out, or allow another person to pay out, any of those credits except in accordance with subsection (2) or (3).</p> <p>(2) A venue operator or gaming operator must, at the request of a person, pay out any accumulated credits from a gaming machine to the person by cheque that is not payable to cash.</p> <p>(3) A venue operator must, at the request of a person:</p> <ul style="list-style-type: none"> <li>(a) pay out any accumulated credits from a gaming machine to the person by electronic funds transfer; and</li> <li>(b) if at least \$2000 is to be transferred, transfer those funds in a way that means they are not available to the person for 24 hours after the transfer.</li> </ul>
5.2	Lotteries	<p><b>Gambling Regulation Act 2003 (8.4.7A)</b></p> <p>(2) The bingo centre operator or a nominee of the community or charitable organisation who is conducting the bingo game must, at the request of a person, pay out any prize money from a bingo game to the person by cheque that is not payable to cash.</p>
6.1	Keno Terrestrial wagering	<p><b>Gambling Regulations 2015 (8)</b></p> <p>(1) At any time when a gaming machine is available for gaming in an approved venue, the venue operator must ensure that lighting in the gaming machine area containing the gaming machine complies with this regulation.</p>
7.3	Online wagering	<p><b>Gambling Regulation Act 2003 (4.7.7)</b></p> <p>The holder of the wagering licence or the wagering operator must not knowingly accept a bet from a person who is in a state of intoxication</p>
8.2	Gaming machines Table gaming Keno Terrestrial wagering	<p><b>Ministerial Direction – Responsible Gambling Codes of Conduct</b></p> <p>A code must identify what the relevant person will do:</p> <ul style="list-style-type: none"> <li>(a) to discourage customers from engaging in extended and intensive gambling; and</li> <li>(b) where appropriate, to ensure customers are made aware of the passage of time.</li> </ul>
8.2	Online wagering Lotteries	<p><b>Ministerial Direction – Responsible Gambling Codes of Conduct</b></p> <p>A code must identify what the relevant person will do:</p> <ul style="list-style-type: none"> <li>(a) to discourage customers from engaging in extended and intensive gambling; and</li> </ul>



Tasmanian Code Section	Tasmanian Code Gambling Activity	Vic Controls
		(b) where appropriate, to ensure customers are made aware of the passage of time.
10.2	Online wagering	<p><b>Ministerial Direction – Responsible Gambling Codes of Conduct</b></p> <p>Require the display of that responsible gambling message wherever the relevant person conducts gambling so that it will be clearly visible to customers</p>
Additional	Terrestrial wagering Online wagering	<p><b>Gambling Regulation Act 2003 (4.7.1)</b></p> <p>(1) A wagering service provider must not display, or cause to be displayed, any gambling advertising that is static betting advertising:</p> <ul style="list-style-type: none"> <li>(a) on public transport infrastructure; or</li> <li>(b) within 150 metres of the perimeter of a school; or</li> <li>(c) on or above a public road, road infrastructure or road reserve.</li> </ul>
Additional	Gaming machines	<p><b>Gambling Regulation Act 2003 (3.5.34AA)</b></p> <p>(1) A venue operator must not publish or cause to be published any gaming machine advertising outside the gaming machine area of an approved venue.</p> <p>(2) A casino operator must not publish or cause to be published any gaming machine advertising outside the boundaries of a casino.</p> <p>(3) A person must not, on behalf of a venue operator, publish or cause to be published any gaming machine advertising outside the gaming machine area of an approved venue.</p> <p>(4) A person must not, on behalf of a casino operator, publish or cause to be published any gaming machine advertising outside the boundaries of a casino.</p>
Additional	Gaming machines	<p><b>Gambling Regulation Act 2003 (3.5.34AC)</b></p> <p>(1) A loyalty scheme operator, venue operator or casino operator must not print or cause to be printed any gaming machine advertising on a player card.</p> <p>(2) A person must not, on behalf of a loyalty scheme provider, venue operator or casino operator, print or cause to be printed any gaming machine advertising on a player card.</p>
Additional	Gaming machines	<p><b>Gambling Regulations 2015 (42D)</b></p> <p>(2) A venue operator must not, while a person is at a gaming machine, assist or allow another person to assist the person at the gaming machine:</p> <ul style="list-style-type: none"> <li>(a) to obtain a non-cash gaming token; or</li> <li>(b) to increase the value of a non-cash gaming token; or</li> <li>(c) to use a cashless gaming terminal.</li> </ul>

Tasmanian Code Section	Tasmanian Code Gambling Activity	Vic Controls
Additional	Gaming machines	<p><b>Ministerial Direction – Responsible Gambling Codes for Venue Operators</b></p> <p>2.3 With the exception of EFTPOS signage, a venue operator must not induce a person to:</p> <ul style="list-style-type: none"> <li>(a) withdraw money, or withdraw more money, from a cash facility; or</li> <li>(b) leave the approved venue to obtain money, or obtain more money, to enable that person to play, or to continue to play, a gaming machine</li> </ul>
Additional	Gaming machines	<p><b>Gambling Regulation Act 2003 (3.5.34)</b></p> <p>(1AA) This section does not apply to a venue operator, a casino operator or a gaming operator or a person acting on behalf of a venue operator, casino operator or gaming operator.</p> <p>(1) A person must not publish or cause to be published any gaming machine advertising outside the gaming machine area of an approved venue (or a venue whose approval under Part 3 is suspended) or the boundaries of a casino.</p> <p><b>Gambling Regulation Act 2003 (3.5.35)</b></p> <p>(1) A person must not display or cause to be displayed any gaming machine related sign</p>
Additional	Gaming machines	<p><b>Gambling Regulations 2015 (10)</b></p> <p>(2) A venue operator or casino operator must not remove the whole or any part of a window to which this regulation applies except for the following purposes:</p> <ul style="list-style-type: none"> <li>(a) replacing the window with a window of equal or greater size;</li> <li>(b) repairing the window.</li> </ul>
Additional	All gambling activities	<p><b>Ministerial Direction – Responsible Gambling Codes of Conduct</b></p> <p>A code must identify what the relevant person will do:</p> <ul style="list-style-type: none"> <li>(a) to discourage customers from engaging in extended and intensive gambling</li> </ul>

## Western Australia

Table 59: Western Australia - Key Differences with Tasmanian Code

Tasmanian Code Section	Tasmanian Code Gambling Activity	WA Controls
1.8	Gaming machines Table gaming	<p><b>Crown Perth Responsible Gaming Code of Conduct</b></p> <p>Gaming advertising will not promote the irresponsible consumption of alcohol</p>

Tasmanian Code Section	Tasmanian Code Gambling Activity	WA Controls
	Keno	
1.9	Online wagering	<p><b>Responsible Wagering Code of Practice</b></p> <p>RWWA must ensure any advertising, promotion or incentives are delivered in a responsible manner with consideration given to the potential impact on people adversely affected by wagering. Specifically, these strategies will ensure that any advertising, promotion or incentive in regards to wagering activities:</p> <ul style="list-style-type: none"> <li>• is in good taste, does not offend community standards and does not involve or encourage minors to participate</li> <li>• avoids cooperative advertising with companies whose predominant products are children's products / activities</li> </ul>
1.10	Gaming machines Table gaming Keno	<p><b>Crown Perth Responsible Gaming Code of Conduct</b></p> <p>Gaming advertising will not depict persons under 18 years of age and will not be broadcast other than in accordance with approved advertising standards for television</p>
1.11	Gaming machines Table gaming Keno	<p><b>Crown Perth Responsible Gaming Code of Conduct</b></p> <p>Gaming advertisements and promotions will not be targeted at vulnerable or disadvantaged groups or portray people in a way that discriminates against a person or section of the community on the basis of their race, ethnicity, nationality, sex, age, sexual preference, religion, disability or political belief</p>
1.13	Terrestrial wagering Online wagering	<p><b>Responsible Wagering Code of Practice</b></p> <p>Periodic messages detailing the helpline for problem gamblers are to be broadcast over Racing Radio. rwwa.com.au and ozbet.com.au should contain Responsible Gambling messages and the contact details of gambling help services available to customers.</p> <p><b>Responsible Wagering Code of Practice</b></p> <p>Point of sale material and printed entry forms, are to be printed with problem gambling messages.</p>
2.3	Online wagering	<p><b>Responsible Wagering Code of Practice</b></p> <p>Prizes for competitions, promotions or provision of incentives do not incorporate:</p> <ul style="list-style-type: none"> <li>• cash in a form where it can be immediately reinvested (Note: Prizes may be in the form of a cheque made payable to the winner)</li> <li>• alcohol</li> <li>• betting vouchers or tickets to a value greater than \$250</li> <li>• payments provided through RWWA's Customer Relationship Management (CRM) Program exceeding \$1,000.</li> </ul>



Tasmanian Code Section	Tasmanian Code Gambling Activity	WA Controls
2.3	Terrestrial wagering	<p><b>Gaming and Wagering Commission Regulations 1988 (43)(2)</b></p> <p>A person must not publish, or cause to be published, in this State a gambling advertisement that:</p> <p>(f) contains an express or implied inducement for a person to contact a gambling operator other than in relation to food, accommodation or other non-gambling goods or services provided by the gambling operator</p> <p><b>Gaming and Wagering Commission Regulations 1988 (43)(7)</b></p> <p>A person must not offer or provide, or cause to be offered or provided, to another person (the second person) a benefit, consideration or reward in return for the second person:</p> <p>(a) participating in gambling; or</p> <p>(b) continuing to gamble; or</p> <p>(c) opening a betting account with a gambling operator; or</p> <p>(d) referring another person to open a betting account with a gambling operator.</p>
2.4	Terrestrial wagering	<p><b>Gaming and Wagering Commission Regulations 1988 (43)(7)</b></p> <p>A person must not offer or provide, or cause to be offered or provided, to another person (the second person) a benefit, consideration or reward in return for the second person:</p> <p>(c) opening a betting account with a gambling operator; or</p> <p>(d) referring another person to open a betting account with a gambling operator.</p>
2.5	Online wagering	<p><b>Responsible Wagering Code of Practice</b></p> <p>Prizes for competitions, promotions or provision of incentives do not incorporate:</p> <ul style="list-style-type: none"> <li>• cash in a form where it can be immediately reinvested (Note: Prizes may be in the form of a cheque made payable to the winner)</li> <li>• alcohol</li> <li>• betting vouchers or tickets to a value greater than \$250</li> <li>• payments provided through RWWA's Customer Relationship Management (CRM) Program exceeding \$1,000.</li> </ul>
4.6	Gaming machines Table gaming Keno	<p><b>Crown Perth Responsible Gaming Code of Conduct</b></p> <p>Customers are required to complete an Application for Cheque Cashing Facility form before a cheque cashing limit is set. Payroll cheques and third party cheques will not be cashed (other than as approved by the Gaming and Wagering Commission of Western Australia).</p>
4.6	Terrestrial wagering	<p><b>Betting Control Regulations 1978 (97)</b></p>



Tasmanian Code Section	Tasmanian Code Gambling Activity	WA Controls
		(3) A person who accepts a cheque as part or full payment for a wager commits an offence.
4.7	Gaming machines Table gaming Keno	<b>Crown Perth Responsible Gaming Code of Conduct</b> Customers are required to complete an Application for Cheque Cashing Facility form before a cheque cashing limit is set. Payroll cheques and third party cheques will not be cashed (other than as approved by the Gaming and Wagering Commission of Western Australia).
5.2	Gaming machines Keno	<b>Crown Perth Responsible Gaming Code of Conduct</b> Relevant staff are instructed to offer customers, who have received large payouts of \$10,000 or more, the opportunity to 'cool off' by taking payment in part or full by cheque.
5.2	Table gaming	<b>Crown Perth Responsible Gaming Code of Conduct</b> Relevant staff are instructed to offer customers, who have received large payouts of \$10,000 or more, the opportunity to 'cool off' by taking payment in part or full by cheque.
6.1	Keno	<b>Crown Perth Responsible Gaming Code of Conduct</b> Adequate lighting is provided in gaming areas of the Casino.
7.3	Online wagering	<b>Betting Control Act 1954 (21)</b> A bookmaker, the licensed manager of a bookmaker or a licensed employee on behalf of a bookmaker, shall not knowingly:  (b) bet with, or pay money or deliver property relating to a bet to, a person apparently under the influence of intoxicating liquor  <b>Responsible Wagering Code of Practice</b> Wagering agents and staff are prohibited by law to knowingly accept bets from persons under the influence of intoxicating liquor.
Additional	Gaming machines Table gaming Keno Terrestrial wagering	<b>Crown Perth Responsible Gaming Code of Conduct</b> Customers are encouraged to take regular breaks from gaming. Customers who are deemed to have not taken sufficient breaks in play may be asked to leave the Casino and not return for a period of 24 hours.  Procedures are implemented to offer those customers who win large prizes the opportunity to take breaks in play.



## Appendix E. Other Jurisdictional Gambling Exclusion Schemes

Table 60: Jurisdictional Gambling Exclusion Schemes

Jurisdiction	Exclusion controls
NSW	<p>By law, all gambling venues in NSW must offer a self-exclusion scheme. The venue can either run its own scheme or engage a third party to provide on their behalf. Self-exclusion schemes must meet minimum requirements and be for a minimum period of six months.<sup>119</sup></p> <p>The Commissioner of Police may also authorise an exclusion order that prevents a specified person from entering a casino<sup>120</sup> or a licensed racecourse<sup>121</sup>.</p>
VIC	<p>Venue operators must provide a self-exclusion program that allows persons to voluntarily exclude themselves from gambling. The self-exclusion program must comply with the standards and requirements set in the Ministerial Direction – Self-Exclusion Program. Venues can conduct their own self-exclusion program or engage a third-party provider to conduct it on their behalf.</p> <p>There are currently two self-exclusion programs conducted on behalf of all venue operators in VIC. These programs are operated by the Australian Hotels Association and Clubs Victoria and both exclude a patron for a period between six and 24 months.<sup>122</sup></p> <p>The VCLGR, a casino operator or the Chief Commissioner of Police can exclude a person from entering a casino. If the exclusion is given orally, it lasts for 14 days. A written exclusion lasts until revoked by the person who gave the order.<sup>123</sup></p>
Qld	<p>The Qld legislation controlling gambling activities supports three types of gambling exclusions:</p> <ul style="list-style-type: none"> <li>• Venue-initiated (where specified patrons are excluded by initiative of the venue)</li> <li>• Patron self-exclusion<sup>124</sup> - which can be initiated with a specific venue or via a Gambling Help Queensland</li> <li>• Exclusion by Commissioner of the Police from a casino.<sup>125</sup></li> </ul> <p>Exclusions can relate to the person entering the whole of a casino, club, hotel or TAB or just into the gaming areas of the venue. Exclusions last for a period of five years.</p>
WA	<p>There are no mandated exclusion schemes in place within Western Australia. Both Crown Perth and RWWA offer a voluntary self-exclusion program through their codes. Self-exclusions last for a minimum of 12 months.</p> <p>Crown Perth also has a Third Party Exclusion Program.<sup>126</sup></p>

<sup>119</sup> [Liquor and Gaming NSW](#) website. Accessed 21 September 2021.

<sup>120</sup> [Casino Control Act 1992](#), Section 81

<sup>121</sup> [Betting and Racing Act 1998](#), Section 15B

<sup>122</sup> [Victorian Commission for Gambling and Liquor Regulation](#) website. Accessed 13 September 2021.

<sup>123</sup> [Casino Control Act 1991](#), Section 72 and 74

<sup>124</sup> [Business Queensland](#) website. Accessed 22 September 2021.

<sup>125</sup> [Casino Control Act 1982](#), Section 94

<sup>126</sup> [Crown Perth](#) website. Accessed 30 September 2021.



Jurisdiction	Exclusion controls
SA	<p>A barring order is the mechanism used for excluding a person from gambling in SA. A barring order can be issued under the following two Acts:</p> <ul style="list-style-type: none"> <li>• Under the Casino Act a licensee, the Liquor and Gambling Commissioner or the Commissioner of Police can issue a barring order</li> <li>• Under the Gambling Administration Act, the Liquor and Gambling Commissioner can issue a barring order.</li> </ul> <p>A barring order can be requested to be issued by an individual seeking to be excluded from gambling, by a third party or by a family member. Barring orders last for a minimum period of three months.</p>
ACT	<p>The ACT Gambling Exclusion Scheme allows a person to be excluded from gambling at licensed venues. A person can either be self-excluded or licensee excluded. Exclusions can last between six months and three years.</p> <p>The ACT Gambling and Racing Commission or the Chief Police Officer may also exclude a person from entering the casino and can last for an indefinite time period.<sup>127</sup> This exclusion scheme is supported by an online database.<sup>128</sup></p>
NT	<p>There are two methods of exclusion in the Northern Territory:</p> <ul style="list-style-type: none"> <li>• Self-exclusion</li> <li>• Licensee exclusion.</li> </ul> <p>Gambling providers and online gambling operators must provide patrons with the option of excluding themselves from their gambling services on the patrons' request. Exclusions last for a period up to two years for venues and any specified period for sports bookmakers and betting exchange operators.</p> <p>Gaming machine licensees can also exclude a person from gambling on a gaming machine for a period of one month.<sup>129</sup></p> <p>All exclusions must be recorded on the Gambling Incident Register.</p>

<sup>127</sup> [Casino Control Act 2006](#), Section 84

<sup>128</sup> [ACT Gambling and Racing Commission](#) website. Accessed 9 September 2021.

<sup>129</sup> [Gaming Machine Act 1995](#), Section 112



## Appendix F. Future Gaming Market Reforms

Key elements of the Tasmanian Government's Future Gaming Market Reforms are outlined in Table 61.

Table 61: Future Gaming Market Reforms<sup>130</sup>

Reform	Description
Decreasing the state wide EGM cap by 150 machines	EGM numbers for hotels and clubs State-wide will be capped at 2350 machines (with current caps of 30 for a hotel and 40 for a club remaining). Any EGMs in venues that exceed the new 1 July 2023 cap will be removed on a 'last in, first out' basis. Casino EGMs will be capped at 1180
Introducing individual venue licences to operate EGMs in hotels and clubs	<p>The rights to operate EGMs in hotels and clubs from 1 July 2023 will be licensed on an individual venue model, for a period of up to 20 years.</p> <p>The day to day operation and player experience of EGMs is not expected to change significantly in hotels and clubs under the new model. However, the responsibilities and choices for the venue operators will change as venue operators will take over several of the functions that the Gaming Operator currently performs. This includes being responsible for:</p> <ul style="list-style-type: none"> <li>the payment of tax, the CSL and prizes in relation to EGM gaming (see further details of payments below)</li> <li>the acquisition (including supply), financing, and storage of EGMs</li> <li>decisions around EGM game choice (from approved EGMs) and return to player settings (subject to the minimum mandated return levels) for machines in their venues</li> <li>arranging with EGM manufacturers to have new EGM games and types, or any modifications to EGM games, approved by the Commission.</li> </ul> <p>The compliance requirements in relation to these functions are not expected to change. However, each individual venue operator will be responsible for understanding and ensuring that the compliance requirements are met.</p> <p>Venue operators will become responsible for paying several regulated fees such as the Licensed Monitoring Operator monitoring fee, EGM installation/maintenance fees and EGM jackpot monitoring fees. Venues will also be responsible for paying all prizes due on EGMs in their venue and ensuring that adequate funds are available for the payment of prizes, including jackpots, at all times.</p> <p>A greater assessment of the financial capacity of venue operators will be required during the licensing process to ensure that they are able to meet these financial obligations.</p>
Introducing a separate Keno Operators licence	<p>The Federal Group will retain the right to operate keno in Tasmania, subject to consultation on licence fees, tax rates and term (for a period up to 20 years).</p> <ul style="list-style-type: none"> <li>Keno in hotels and clubs will not change, with the Federal Group conducting keno games as the keno operator and hotels and clubs selling tickets in return for a commission</li> <li>The licence to conduct keno will change from a Gaming Operator licence to a new Keno Operator licence. Venue commission will continue to be a regulated arrangement between the operator and venue.</li> </ul> <p>From a customer perspective, the way Keno gaming operates will not change.</p>

<sup>130</sup> The description of the reforms in this table has been sourced from *Future of Gaming in Tasmania, Public Consultation Paper 2020*, Tasmanian Department of Treasury and Finance, February 2020.



Reform	Description
<p>Offering up two new high roller non-resident casino licences</p>	<p>Two ‘<i>high roller, non-resident</i>’ casino licences (which exclude EGMs) are to be made available, subject to consultation on licence fees, tax rates and term (up to 20 years) - one licence will be offered to Mr David Walsh at MONA and a second licence will be made available in the north (including the north west) of the State.</p> <p>High roller casinos will operate in a similar manner to regular casinos, but with minimum betting requirements that are usually significantly larger than regular casino bet limits. EGMs will not be permitted in high roller casinos.</p> <p>The high roller casino licence to be offered in the north of the State is subject to a cost-benefit analysis demonstrating that it is in the State’s best interest and the proponent meeting the necessary licence requirements in addition to consultation on returns.</p>
<p>Establishing a more appropriate distribution of returns from gaming</p>	<p>The venue licence holder will pay a fixed and progressive annual licence fee per EGM (between \$1000 and \$2500).</p> <p>Venues will retain no less than 50 per cent of gross profit (with the current two per cent differential in commission paid to hotels and clubs to be maintained). Venues will pay an ongoing fee to the licensed network monitoring operator.</p> <p>The minimum return to player (RTP) for EGMs will rise from 85% to 87% - effectively redistributing a proportion of gambling revenue back to players.</p> <p>The Government will retain approximately 48 per cent of all EGM gross profit from hotels and clubs (inclusive of Community Support Levy payments and GST).</p>
<p>Establishing a separate Licensed Monitoring Operator to monitor the hotel and club EGM network.</p>	<p>Under the new model, a Licensed Monitoring Operator (LMO) is to be established and operational from 1 July 2023. The licence to provide a service to monitor the network of EGMs in hotels and clubs is to be put to public tender by Treasury prior to this date.</p> <p>The LMO will be responsible for providing and operating a fit-for-purpose monitoring system that, among other things, monitors EGM transactions in hotel and club venues in Tasmania.</p> <p>The LMO will be required to ensure the integrity of EGM transactions by monitoring EGM activity and providing data and information on EGMs for regulatory and taxation purposes.</p> <p>The LMO will also be responsible for several additional functions in relation to EGM operations in hotels and clubs and these functions will be separated into three different areas. These are:</p> <ul style="list-style-type: none"> <li>• ‘core monitoring’ functions for which venues will be required to pay a fee (on a per EGM per day basis) each month</li> <li>• ‘regulated’ functions that only the LMO will be permitted to undertake for which venues will be required to pay the LMO a regulated fee</li> <li>• ‘other’ functions that the LMO or other third party service providers will be permitted to perform under a commercial arrangement with venues, or which a venue could perform itself.</li> </ul> <p>The core monitoring functions include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• the operation of a core monitoring system in accordance with the Commission’s Gaming Machine Monitoring System Technical Standards</li> <li>• monitoring of EGMs in venues (e.g. EGM verification, logic door openings, large win notification)</li> <li>• EGM help desk services for venues</li> </ul>



Reform	Description
	<ul style="list-style-type: none"> <li>• Central Monitoring System reporting functions for venues and the regulator</li> <li>• EGM player expenditure, tax and CSL verification</li> <li>• investigation of EGM complaints in venues</li> <li>• preparation and management of LMO and venue contractual arrangements.</li> </ul> <p>The 'regulated' functions will include:</p> <ul style="list-style-type: none"> <li>• EGM installation, set-up and technical venue preparation</li> <li>• EGM jackpot monitoring</li> <li>• EGM repair and maintenance for venues.</li> </ul> <p>In addition, several 'other' functions under the new model will be permitted to be undertaken by the venue itself, or the LMO, or other third party service providers under a commercial arrangement. These functions include:</p> <ul style="list-style-type: none"> <li>• training of venue staff in EGM operations</li> <li>• the provision of EGM data analysis for venues</li> <li>• delivery of EGMs to venues</li> <li>• storage of EGMs.</li> </ul>
Changes to automated table games arrangements	Fully Automated Table Games will be allowed to operate in casinos.
Removing the monopoly on simulated racing event	<p>Federal Group's exclusivity to operate the simulated racing event known as Trackside as a casino game will be removed.</p> <p>This will enable simulated racing events to be operated by the totalizator operator UBET TAS Pty Ltd in endorsed hotels, clubs and totalizator outlets (but not online)</p>
Increasing funding to improve harm minimisation	<p>The Community Support Levy (CSL) is to be applied to EGMs in casinos at a rate of three per cent. The CSL rate for hotels will increase to five per cent, with the rate for clubs to remain at four per cent.</p> <p>The Government has guaranteed that the CSL funding pool will be double the CSL amount raised just prior to commencement. To the extent that the new rates are not sufficient to achieve this, Government will provide a direct contribution to make up any shortfall.</p>

In tabling the legislative reforms in Parliament, the Minister for Finance announced he would direct the Tasmanian Liquor and Gaming Commission to:

*... investigate options for the use of facial recognition technology and card-based gaming in Tasmanian casinos, hotels and clubs. I will also be asking, following consultation with relevant stakeholders for advice on pre-commitment models which could complement card-based gaming*

He stated that:

*... it is my expectation that the introduction of these measures in Tasmania will significantly improve harm minimisation through better identification of excluded players and the ability for players to set limits on their EGM gaming time and expenditure.*

